

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, JANE HAMILTON,)	
SERGIO DELEON, FLOYD J. CARRIER,)	
ANNA BURNS, MICHAEL MONTEZ,)	
PENNY POPE, OSCAR ORTIZ, KOBY)	
OZIAS, JOHN MELLOR-CRUMLEY, PEGGY)	
HERMAN, EVELYN BRICKNER, GORDON)	
BENJAMIN, KEN GANDY, LEAGUE OF)	
UNITED LATIN AMERICAN CITIZENS)	
(LULAC), AND DALLAS COUNTY,)	
TEXAS,)	CIVIL ACTION
Plaintiffs,)	NO.
)	2:13-CV-193
v.)	(NGR)
)	[Lead case]
RICK PERRY, Governor of Texas;)	
and JOHN STEEN, Texas Secretary)	
of State,)	
Defendants.)	
_____)	
)	
UNITED STATES OF AMERICA,)	
Plaintiffs,)	
)	
TEXAS LEAGUE OF YOUNG VOTERS)	
EDUCATION FUND, IMANI CLARK, AND)	
MICHELLE BESSIAKE,)	
Plaintiff-Intervenors,)	
)	
TEXAS ASSOCIATION OF HISPANIC)	
COUNTY JUDGES AND COUNTY)	
COMMISSIONERS, HIDALGO COUNTY,)	
AND MARIA LONGORIA BENAVIDES,)	CIVIL ACTION
Plaintiff-Intervenors,)	NO.
)	2:13-CV-263
v.)	(NGR)
)	Consolidated
STATE OF TEXAS, JOHN STEEN, in)	case
his official capacity as Texas)	
Secretary of State; and STEVE)	
McCRAW, in his official capacity)	
as Director of the Texas)	
Department of Public Safety,)	
Defendants.)	
_____)	

<p>2</p> <p>1 _____) 2) 3 TEXAS STATE CONFERENCE OF NAACP) 4 BRANCHES; and the MEXICAN) 5 AMERICAN LEGISLATIVE CAUCUS OF) 6 THE TEXAS HOUSE OF) 7 REPRESENTATIVES,) CIVIL ACTION 8 Plaintiffs,) NO. 9) 2:13-CV-291 10 v.) (NGR) 11) Consolidated 12 JOHN STEEN, in his official) case 13 capacity as Secretary of State of) 14 Texas; and STEVE McCRAW, in his) 15 official capacity as Director) 16 of the Texas Department of Public) 17 Safety,) 18 Defendants.) 19 _____) 20) 21 BELINDA ORTIZ, LENARD TAYLOR,) 22 EULALIO MENDEZ JR., LIONEL) 23 ESTRADA; ESTELA GARCIA ESPINOSA,) 24 LYDIA LARA, MARGARITO MARTINEZ) 25 LARA, MAXIMINA MARTINEZ LARA, AND) CIVIL ACTION LA UNION DEL PUEBLO ENTERO, INC.) NO. Plaintiffs,) 2:13-CV-348 v.) (NGR) Consolidated case STATE OF TEXAS; JOHN STEEN, in his) Official capacity as Texas) Secretary of State; and STEVE) McCRAW, in his official capacity) As Director of the Texas) Department of Public Safety,) Defendants.) _____ ORAL DEPOSITION OF LINDA LYDIA JUNE 6, 2014 _____</p>	<p>4</p> <p>1 A P P E A R A N C E S 2 FOR THE PLAINTIFFS: 3 AMY L. RUDD 4 DECHERT LLP 5 633 West 5th Street, 37th Floor 6 Los Angeles, CA 90071-2013 7 T: 213.808.5700 8 F: 213.808.5760 9 amy.rudd@dechert.com 10 11 FOR THE DEFENDANTS: 12 13 STEPHEN TATUM 14 OFFICE OF THE ATTORNEY GENERAL 15 209 West 14th Street 16 Austin, Texas 78711 17 T: 512.463.3133 18 D: 817.713.9492 19 stephen.tatum@texasattorneygeneral.gov 20 21 FOR PLAINTIFF UNITED STATES OF AMERICA: 22 (attended via teleconference) 23 24 Angela J. Miller 25 Trial Attorney Voting Section, Civil Rights Division U.S. Department of Justice 950 Pennsylvania Ave., NW NWB Room 7204 Washington, DC 20530 T: (202) 514-2919 angela.miller5@usdoj.gov THE COURT REPORTER: Karen L. D. Schoeve Certified Realtime Reporter Registered Diplomat Reporter Integrity Legal Support Solutions Firm Registration No. 528 3100 W. Slaughter Lane, Suite A-101 Austin, Texas 78748 (512) 320-8690 (512) 320-8692 (fax)</p>
<p>3</p> <p>1 2 3 ORAL DEPOSITION OF LINDA LYDIA, 4 produced as a witness at the instance of the 5 Defendants, and duly sworn, was taken in the 6 above-styled and numbered cause on June 6, 2014, 7 from 8:48 a.m. to 1:11 p.m., before Karen L. D. 8 Schoeve, CRR, RDR, in and for the State of Texas, 9 reported by machine shorthand, at the law offices 10 of Locke Lord, LLP, 2200 Ross Avenue, Suite 2200, 11 Dallas, Texas, pursuant to the Federal Rules of 12 Civil Procedure and the provisions stated on the 13 record or attached hereto. 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>5</p> <p>1 INDEX 2 3 PAGE 4 Appearances 4 5 6 LINDA LYDIA 7 Examination by Mr. Tatum 7 8 Examination by Ms. Rudd --- 9 Examination by Ms. Miller --- 10 Afternoon Session 126 11 Changes and Signature 163 12 Reporter's Certificate 165 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

<p style="text-align: right;">6</p> <p>1 EXHIBIT INDEX</p> <p>2 NO. DESCRIPTION PAGE</p> <p>3 Exhibit Number 1 13</p> <p>4 Defendants' Second Amended Notice of</p> <p>5 Intention to Take Oral Deposition of the</p> <p>6 Texas State Conference of NAACP Branches</p> <p>7 Exhibit Number 2 19</p> <p>8 Complaint for Declaratory and</p> <p>9 Injunctive Relief</p> <p>10 Exhibit Number 3 94</p> <p>11 E-mail chain</p> <p>12 Bates stamped TSC00006037 - 6039</p> <p>13 Exhibit Number 4 99</p> <p>14 E-mail chain</p> <p>15 Bates stamped TSC00006029 - 6031</p> <p>16 Exhibit Number 5 105</p> <p>17 E-mail chain</p> <p>18 Bates stamped TSC00006032 - 6036</p> <p>19 Exhibit Number 6 113</p> <p>20 Urgent Action Alert</p> <p>21 Bates stamped TSC00006061</p> <p>22 Exhibit Number 7 116</p> <p>23 Minutes of Executive Committee</p> <p>24 January 25, 2014 - Lufkin, Texas</p> <p>25 Exhibit Number 8 119</p> <p>Election Protection flyer</p> <p>Bates stamped TSC00006062 - 6063</p> <p>Exhibit Number 9 122</p> <p>Election Identification Certificate</p> <p>(EIC) Study</p> <p>TSC00006058</p>	<p style="text-align: right;">8</p> <p>1 Q. And, Miss Lydia, when were you born?</p> <p>2 A. January 3rd, 1950.</p> <p>3 Q. Okay. Are you currently employed?</p> <p>4 A. Yes, I am.</p> <p>5 Q. Are where are you currently employed?</p> <p>6 A. Mersal Realty as a realtor and also</p> <p>7 part-time doing some marketing for a retail</p> <p>8 product, is what I call it.</p> <p>9 Q. Okay. May I ask what that retail</p> <p>10 product is --</p> <p>11 (Telephone interruption.)</p> <p>12 MS. MILLER: Hey there. This is</p> <p>13 Angela Miller from the DOJ.</p> <p>14 MS. RUDD: Hi, Angela. This is Amy</p> <p>15 Rudd. We just started, and your name is on the</p> <p>16 record.</p> <p>17 MS. MILLER: Okay. Great. Sorry.</p> <p>18 I thought we were starting later, so...</p> <p>19 MS. RUDD: No problem. That's why</p> <p>20 I e-mailed you. Just one sec.</p> <p>21 MR. TATUM: That was Angela Miller</p> <p>22 calling in, and I just realized I didn't allow</p> <p>23 you to make an introduction, Amy, if you'd like</p> <p>24 to.</p> <p>25 MS. RUDD: Amy Rudd for the Texas</p>
<p style="text-align: right;">7</p> <p>1 PROCEEDINGS</p> <p>2</p> <p>3 LINDA LYDIA,</p> <p>4 having been first duly sworn, testified as</p> <p>5 follows:</p> <p>6 EXAMINATION</p> <p>7 BY MR. TATUM:</p> <p>8 Q. Good morning.</p> <p>9 A. Good morning.</p> <p>10 Q. My name is Stephen Tatum. I'm an</p> <p>11 assistant attorney general in the State of Texas,</p> <p>12 and I'm representing the defendants in this</p> <p>13 matter.</p> <p>14 This is Case Number 2:13-CV-193 in</p> <p>15 Federal District Court, Southern District of</p> <p>16 Texas, and consolidated cases.</p> <p>17 This is the deposition of Linda</p> <p>18 Lydia. It is about 8:48 on June 6th. We're here</p> <p>19 at the offices of Locke Lord in Dallas, Texas.</p> <p>20 Ms. Lydia, would you please state</p> <p>21 your full name for the record, please.</p> <p>22 A. Linda Darden Lydia.</p> <p>23 Q. And, Miss Lydia, where do you reside?</p> <p>24 A. I reside at the 1332 Bow Creek Drive,</p> <p>25 Duncanville, Texas 75116.</p>	<p style="text-align: right;">9</p> <p>1 State Conference of the NAACP.</p> <p>2 MR. TATUM: Thank you.</p> <p>3 Q. (BY MR. TATUM) So, Miss Lydia, you</p> <p>4 were about to tell me about the product that you</p> <p>5 do marketing --</p> <p>6 A. The product is a real estate product;</p> <p>7 is a utility connection service for realtors.</p> <p>8 Q. Okay. And have you ever been deposed</p> <p>9 before?</p> <p>10 A. No.</p> <p>11 Q. Okay. I'm going to ask you some</p> <p>12 preliminary questions before we begin and then</p> <p>13 I'm going to go over some ground rules --</p> <p>14 A. Okay.</p> <p>15 Q. -- for control of the deposition.</p> <p>16 First, Miss Lydia, how are you</p> <p>17 feeling today?</p> <p>18 A. Sleepy.</p> <p>19 Q. Sleepy.</p> <p>20 A. Not enough sleep.</p> <p>21 Q. Okay. Are you suffering from any</p> <p>22 illness today that would affect your ability to</p> <p>23 provide accurate and truthful answers to my</p> <p>24 questions?</p> <p>25 A. No, sir.</p>

<p style="text-align: right;">10</p> <p>1 Q. Are you taking any medications that</p> <p>2 would affect your ability to provide accurate and</p> <p>3 truthful answers to my questions?</p> <p>4 A. No, sir.</p> <p>5 Q. Is there anything else this morning</p> <p>6 that might prevent you from accurately and</p> <p>7 truthfully answering my questions?</p> <p>8 A. No.</p> <p>9 Q. That includes being sleepy.</p> <p>10 A. That's correct.</p> <p>11 Q. Okay. You understand that you've been</p> <p>12 sworn to tell the truth today.</p> <p>13 A. Yes, sir.</p> <p>14 Q. Okay. I'm going to be asking you some</p> <p>15 questions, and I need you to answer them audibly</p> <p>16 for the court reporter and those joining us over</p> <p>17 the phone. Do you understand?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. If you would, please, if you're</p> <p>20 going to answer yes or no to a question, please</p> <p>21 say yes or no. Don't nod your head or shake your</p> <p>22 head.</p> <p>23 A. Yes.</p> <p>24 Q. And, please, if you would, wait until I</p> <p>25 finish stating my question before answering and I</p>	<p style="text-align: right;">12</p> <p>1 you?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Ms. Lydia, what did you do to</p> <p>4 prepare for your deposition today?</p> <p>5 A. I read through the complaint that was</p> <p>6 filed by the State Conference and beyond that</p> <p>7 not -- not --</p> <p>8 Q. Did you --</p> <p>9 A. I have discussed this with Amy and</p> <p>10 beyond that, not anything.</p> <p>11 Q. Did you meet with anyone else besides</p> <p>12 Amy in preparation for this deposition?</p> <p>13 A. I have had a discussion with Gary</p> <p>14 Bledsoe, our attorney with the State Conference.</p> <p>15 Q. Okay. And when was that discussion?</p> <p>16 A. Probably a few days ago. I'm not sure</p> <p>17 of the exact date.</p> <p>18 Q. And how long was that discussion?</p> <p>19 A. 15, 20 minutes, maybe.</p> <p>20 Q. Was anyone else a party to that</p> <p>21 discussion?</p> <p>22 A. Amy was on the discussion -- was on the</p> <p>23 phone because it was actually a conference call</p> <p>24 and Yannis Banks, our paid staff person.</p> <p>25 Q. Were there any other meetings held in</p>
<p style="text-align: right;">11</p> <p>1 will try to do the same to you when you are</p> <p>2 answering.</p> <p>3 This is easier said than done.</p> <p>4 There may be times when we accidentally speak</p> <p>5 over each other. I just ask that we try to allow</p> <p>6 each other to finish before answering or asking a</p> <p>7 question.</p> <p>8 Do you understand?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. If you don't understand a</p> <p>11 question that I ask or you need clarification of</p> <p>12 a question that I ask, please say so and I will</p> <p>13 gladly rephrase or repeat the question.</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And there made be times today</p> <p>16 when your attorney will object to a question that</p> <p>17 I ask. In that case, you can still answer the</p> <p>18 question unless your attorney specifically</p> <p>19 instructs you not to.</p> <p>20 Do you understand?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And, Miss Lydia, you are</p> <p>23 represented by counsel today; is that correct?</p> <p>24 A. That's correct.</p> <p>25 Q. And is that Amy Rudd sitting next to</p>	<p style="text-align: right;">13</p> <p>1 preparation for this deposition?</p> <p>2 A. No.</p> <p>3 Q. Other than the complaint, did you</p> <p>4 review any other documents in preparation for</p> <p>5 this deposition?</p> <p>6 A. No.</p> <p>7 Q. Okay. Overall how much time would you</p> <p>8 say you spent review- -- preparing for this</p> <p>9 deposition?</p> <p>10 A. Maybe an hour.</p> <p>11 Q. Maybe an hour?</p> <p>12 A. Yes.</p> <p>13 Q. Did you bring any documents with you</p> <p>14 here today?</p> <p>15 A. I only brought the complaint and</p> <p>16 directions or information about how to get here.</p> <p>17 And some insight into what I may be discussing.</p> <p>18 Q. Okay. Did you do anything else to</p> <p>19 prepare that you did not already mention?</p> <p>20 A. No.</p> <p>21 (Deposition Exhibit Number 1 was</p> <p>22 marked for identification.)</p> <p>23 Q. (BY MR. TATUM) Ms. Lydia, I'm handing</p> <p>24 you what has been marked as Exhibit 1.</p> <p>25 MR. TATUM: Would you like a copy?</p>

<p style="text-align: right;">14</p> <p>1 MS. RUDD: Is it the topics?</p> <p>2 MR. TATUM: Yes.</p> <p>3 MS. RUDD: No.</p> <p>4 A. Okay.</p> <p>5 Q. (BY MR. TATUM) Miss Lydia, have you</p> <p>6 ever seen this document before?</p> <p>7 A. (Witness examined exhibit.)</p> <p>8 I'm not sure, to be perfectly</p> <p>9 honest. I get a lot of documents forwarded to</p> <p>10 me.</p> <p>11 Q. Um-hum.</p> <p>12 A. But I'm not sure if this one in</p> <p>13 particular -- I can't say for sure.</p> <p>14 Q. You can hold on to that.</p> <p>15 A. Okay.</p> <p>16 Q. And, Miss Lydia, I represent to you</p> <p>17 that this is the Defendants' Seconded Amended</p> <p>18 Notice of Intention to Take Oral Deposition --</p> <p>19 A. Okay.</p> <p>20 Q. -- of the Texas State Conference of</p> <p>21 NAACP Branches.</p> <p>22 A. Okay.</p> <p>23 Q. In other words, this is the notice of</p> <p>24 the intent to take your --</p> <p>25 A. Okay.</p>	<p style="text-align: right;">16</p> <p>1 MS. RUDD: And, Stephen, let me</p> <p>2 just say for the record that because Linda</p> <p>3 operates the executive level of the Texas NAACP,</p> <p>4 there may be topics in here that she's just not</p> <p>5 familiar enough with the subject matter to</p> <p>6 discuss, and she can tell you that in the context</p> <p>7 of today's deposition.</p> <p>8 MR. TATUM: Okay.</p> <p>9 Q. (BY MR. TATUM) Miss Lydia, are you</p> <p>10 aware that you've been designated by the Texas</p> <p>11 NAACP to testify on its behalf regarding the</p> <p>12 matters contained in this notice?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And are you willing and able to give</p> <p>15 binding answers to questions that are based on</p> <p>16 the matters contained in this notice?</p> <p>17 A. I would say some of them.</p> <p>18 Q. Are there any -- at the outset, upon</p> <p>19 looking at it in front of you, that you are not</p> <p>20 able to testify to?</p> <p>21 A. I would say there are a number of them.</p> <p>22 Q. Can you point out which ones those are.</p> <p>23 A. (Witness examined exhibit.)</p> <p>24 I'm needing to read them.</p> <p>25 Q. Take your time.</p>
<p style="text-align: right;">15</p> <p>1 Q. -- deposition.</p> <p>2 A. Okay. Got you. All right.</p> <p>3 Q. And again, please, if you don't mind,</p> <p>4 wait until I finish --</p> <p>5 A. Okay.</p> <p>6 Q. -- stating the question before you</p> <p>7 answer so we don't talk over each other.</p> <p>8 Miss Lydia, would you do me a favor</p> <p>9 and turn to Page 5, please.</p> <p>10 Are you there?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Okay. At the bottom of that page</p> <p>13 there's a section entitled "Matters." Do you see</p> <p>14 that?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. Following that title and on the</p> <p>17 succeeding pages there are a number of -- there</p> <p>18 is a list of numbered paragraphs from 1 to 24</p> <p>19 going onto page 8. Do you see those paragraphs?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Okay. These are the matters that we</p> <p>22 have noticed we'll be discussing in this</p> <p>23 deposition today. The Texas NAACP has stated</p> <p>24 that they are not producing a witness to testify</p> <p>25 to topics 3, 4, and 18.</p>	<p style="text-align: right;">17</p> <p>1 A. Okay. Thank you. (Witness examined</p> <p>2 exhibit.)</p> <p>3 There are a few that I'm not sure</p> <p>4 that I completely understand, Mr. Tatum. And</p> <p>5 then there's some that I definitely do not have</p> <p>6 knowledge of.</p> <p>7 Q. So to confirm, some of these matters</p> <p>8 you don't understand --</p> <p>9 A. Um-hum. I don't fully understand.</p> <p>10 Q. Sorry. If you don't mind, please let</p> <p>11 me finish my question.</p> <p>12 There are some matters on here that</p> <p>13 you don't understand, and there are others that</p> <p>14 you are not prepared to testify to?</p> <p>15 A. That's correct.</p> <p>16 Q. Can you indicate which matters you are</p> <p>17 not prepared to testify to today?</p> <p>18 A. The identity of your members on</p> <p>19 September 17th, 2013.</p> <p>20 Q. And if you want to, you can just point</p> <p>21 out the numbered paragraph.</p> <p>22 A. Okay. Number 3.</p> <p>23 Number 4.</p> <p>24 Number 12.</p> <p>25 Number 13.</p>

<p style="text-align: right;">18</p> <p>1 Number 14. 2 Number 15. 3 Number 17. 4 Number 18. 5 Number 21. 6 Number 23. 7 And Number 24. 8 Oh, I'm sorry, and I missed 9 Number 7. 10 Q. So to confirm, you are not prepared to 11 testify to Topics 3, 4, 7, 12, 13, 14, 15, 18, 12 21, 23 and 24; is that correct? 13 17 in his list.] 14 A. Yes, sir. 15 Q. And also to confirm, this is the first 16 time today that you've seen this document? 17 A. Yes, sir. 18 Q. So the topics that you did not mention, 19 you are prepared to testify to today? 20 A. I think I said there were two sets of 21 -- 22 Q. That you didn't -- 23 A. -- concerns. One is I didn't 24 understand some of the questions. And the other 25 one is one I definitely do not have knowledge of.</p>	<p style="text-align: right;">20</p> <p>1 Q. Do you feel like you were prepared to 2 testify about the factual bases of the claims 3 stated in this complaint? 4 A. For the most part. 5 Q. For the most part. Okay. 6 (Discussion off the record.) 7 Q. (BY MR. TATUM) And, Ms. Lydia, you 8 mentioned your employment in the real estate 9 industry. 10 A. Yes, sir. 11 Q. Are you also employed by the Texas 12 NAACP? 13 A. No, I'm not. 14 Q. What is your involvement with the Texas 15 NAACP? 16 A. I'm an elected officer of the Texas 17 NAACP. 18 Q. And as an elected officer, do you have 19 an official title? 20 A. Yes, I do. 21 Q. And what is that? 22 A. Secretary. 23 Q. And when were you elected to that 24 position? 25 A. Gosh, probably about eight years ago --</p>
<p style="text-align: right;">19</p> <p>1 Q. Okay. We'll see how these play out as 2 we go along. 3 MS. RUDD: I think that's the best 4 way to do it. 5 MR. TATUM: Okay. 6 (Deposition Exhibit Number 2 was 7 marked for identification.) 8 Q. (BY MR. TATUM) Miss Lydia, I'm handing 9 you what's been marked as Exhibit 2. 10 A. Um-hum. 11 Q. And I believe based on what you said 12 earlier that you will recognize this document -- 13 A. Okay. 14 Q. -- but let me just ask. Do you 15 recognize this document? 16 A. Yes. 17 Q. And what is this document? 18 A. This is the complaint for declaratory 19 and injunctive re -- for relief. Sorry. 20 Q. And was this complaint filed by the 21 Texas NAACP? 22 A. Yes. 23 Q. Okay. Did you assist or help in any 24 way in the preparation of this document? 25 A. No.</p>	<p style="text-align: right;">21</p> <p>1 and I'm not certain, but that is a speculation. 2 Around eight years ago. 3 Q. That would be 2006? 4 A. Yes. 5 Q. And I think you answered this already, 6 but is that a paid position? 7 A. No. 8 Q. You act as secretary on a voluntary 9 basis? 10 A. That's correct. 11 Q. Okay. And when you say "secretary," is 12 that secretary of the Texas NAACP? 13 A. That's correct. 14 Q. And I want to clarify, when I refer 15 to -- I'll be talking about the Texas NAACP. And 16 when I say the Texas NAACP, I mean the Texas 17 Conference of NAACP Branches. 18 A. Units. 19 Q. Units. 20 A. Um-hum. 21 Q. They're also referred to as units? 22 A. That's correct. 23 Q. Okay. In this case they've been called 24 branches -- 25 A. Okay.</p>

22

1 Q. -- so I'll call them branches.
 2 A. That's fine.
 3 Q. And there may be times when I just say
 4 "NAACP." If I do that, I'm referring to the
 5 Texas Conference. If I intend to speak to the
 6 national NAACP, I will say so, and if that's not
 7 clear, please ask me to clarify.
 8 A. Yes.
 9 Q. Okay. So you said you were the
 10 secretary for the Texas NAACP, correct?
 11 A. Yes.
 12 Q. Okay. How long have you held that -- I
 13 believe you said you've held that position for
 14 eight years?
 15 A. Approximately. I -- I also said I do
 16 not know the exact date. So it's somewhere in
 17 that area. Not for certain though.
 18 Q. Did you do anything for the Texas NAACP
 19 before that?
 20 A. Yes.
 21 Q. And what was that?
 22 A. I was a state youth advisor.
 23 Q. And what does a state youth advisor do?
 24 A. Coordinate the activities of our youth
 25 in college units in our state.

24

1 Q. Okay. When did you first become a
 2 member of the Texas NAACP?
 3 A. I don't have a membership with the
 4 Texas NAACP.
 5 Q. You are not a member of the Texas
 6 NAACP?
 7 A. We do not have memberships within the
 8 Texas State Conference of NAACP branches or
 9 units, whichever term you use. The memberships
 10 would rest with the national via a branch or a
 11 unit. I am actually a member of the Dallas
 12 NAACP.
 13 Q. So you're a member of the Dallas
 14 branch --
 15 A. Um-hum.
 16 Q. -- of the Texas NAACP?
 17 A. Well, the branches come under the Texas
 18 State Conference auspices. But the membership
 19 rests with the branches. Branches, youth
 20 councils and college chapters hold the
 21 memberships. The State Conference does not have
 22 memberships. Even our president, his membership
 23 would be with a branch.
 24 Q. So you're -- I'm just trying to make
 25 sure I understand this.

23

1 Q. And how long were you a state youth
 2 advisors?
 3 A. Probably for six years. Again, I'm not
 4 sure of the exact dates.
 5 Q. Did you do anything for the Texas NAACP
 6 before you were a state youth advisor?
 7 A. I'm trying to make certain I'm not
 8 overlooking something and not answering
 9 factually. I know I served in the capacity as
 10 our ACT-SO coordinator, which is Academic,
 11 Cultural, Technology and Scientific Olympics.
 12 That's done on a statewide basis. So I've done
 13 that.
 14 I think that's pretty much the
 15 capacities that I've held within the State
 16 Conference.
 17 Q. So you've been secretary for eight
 18 years. Before that you were state youth advisor
 19 for four to six years --
 20 A. Um-hum.
 21 Q. -- roughly, and before that you were in
 22 the roles you just spoke to. Overall, how many
 23 years have you been working for or with the Texas
 24 NAACP?
 25 A. I would say probably around 20 years.

25

1 A. Um-hum.
 2 Q. You're a member of the Dallas branch --
 3 A. Um-hum.
 4 Q. -- of the Texas NAACP or the National
 5 NAACP?
 6 A. National NAACP.
 7 Q. Okay. And how long have you been a
 8 member of the Dallas branch of the National
 9 NAACP?
 10 A. I've been a member of the NAACP
 11 probably for, I would say, 40 years. Not
 12 necessarily affiliated with the Dallas branch
 13 because I've lived in various locations.
 14 Q. Where have you lived?
 15 A. I lived in Nashville, Tennessee. I was
 16 a member of a college chapter in Nashville,
 17 Tennessee.
 18 I was a member of a unit in Grand
 19 Prairie, Texas.
 20 I was also a member of a unit in
 21 Los Angeles, California.
 22 And back to Dallas with the Dallas
 23 NAACP.
 24 Q. So when you move -- moved back to
 25 Dallas, you did not need to fill out a -- or

<p>26</p> <p>1 apply for a new membership to the Dallas branch.</p> <p>2 Your previous membership stayed with you?</p> <p>3 A. Our membership structure is such, you</p> <p>4 can either buy a yearly membership or you can buy</p> <p>5 life memberships. When I joined the Grand</p> <p>6 Prairie NAACP, I became a life member. So my</p> <p>7 life membership could be transferred from one</p> <p>8 unit to another unit with a life membership</p> <p>9 versus a yearly membership.</p> <p>10 Q. All right. And that involves a</p> <p>11 one-time fee?</p> <p>12 A. A one-time fee.</p> <p>13 Q. Okay. As secretary for the Texas</p> <p>14 NAACP, what are your official duties or</p> <p>15 responsibilities?</p> <p>16 A. Multitude. I do communication to our</p> <p>17 units. That's generated by members of our</p> <p>18 executive committee. That would include our</p> <p>19 officers and our standing committee chairs.</p> <p>20 I also provide information to our</p> <p>21 units, our branches and our youth councils and</p> <p>22 our college chapters regarding activities</p> <p>23 programming of our state conference.</p> <p>24 I collect or take minutes of</p> <p>25 meetings.</p>	<p>28</p> <p>1 does. I will be doing that or I will designate</p> <p>2 our assistant secretary to assist in performance.</p> <p>3 Q. Earlier when you said -- I believe you</p> <p>4 said something to the effect of</p> <p>5 "constitutionally" you manage one person or</p> <p>6 something to that effect.</p> <p>7 A. Yes. I did say that.</p> <p>8 Q. Okay. When you refer -- when you say,</p> <p>9 "constitutionally," are you referring to some</p> <p>10 kind of governing document?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And what is that?</p> <p>13 A. That would be our bylaws for our state</p> <p>14 conference.</p> <p>15 (Discussion off the record.)</p> <p>16 Q. (BY MR. TATUM) So, Miss Lydia, you are</p> <p>17 on the executive committee of the Texas NAACP,</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. And you attend, to the extent that you</p> <p>21 can, all of the regular meetings of the executive</p> <p>22 committee?</p> <p>23 A. That's correct.</p> <p>24 Q. How often does the executive committee</p> <p>25 meet?</p>
<p>27</p> <p>1 I coordinate our planning of</p> <p>2 meetings, whether it's quarterly meetings or our</p> <p>3 state conventions or other specially designated</p> <p>4 meetings that we have during the year for various</p> <p>5 purposes.</p> <p>6 Q. Do you manage or supervise anyone?</p> <p>7 A. Constitutionally, I manage our one paid</p> <p>8 staff person and that would be Yannis Banks.</p> <p>9 Q. And when you say "constitutionally,"</p> <p>10 what are you referring to?</p> <p>11 A. Well, at one time I did a lot of</p> <p>12 management of Yannis, but with our legislative</p> <p>13 session and the onset of a number of different</p> <p>14 things, we sort of shifted his position to be a</p> <p>15 legislative liaison. And so at that time because</p> <p>16 of the geographical proximity -- he lives in</p> <p>17 Austin, I live in Dallas, it was so much easier</p> <p>18 for that become -- come under the purview of Gary</p> <p>19 Bledsoe, our State Conference president.</p> <p>20 Q. When you --</p> <p>21 A. We actually --</p> <p>22 Q. Sorry. Go ahead.</p> <p>23 A. We actually needed him more in that</p> <p>24 capacity than doing some of the administrative</p> <p>25 things that he should have been doing or normally</p>	<p>29</p> <p>1 A. Quarterly.</p> <p>2 Q. Do they meet in the same place every</p> <p>3 year?</p> <p>4 A. No.</p> <p>5 Q. Where did they meet last time, if you</p> <p>6 recall?</p> <p>7 A. Our last meeting was in Lufkin, Texas.</p> <p>8 Q. Do you regularly interact with Gary</p> <p>9 Bledsoe, the president of the Texas NAACP?</p> <p>10 A. Yes.</p> <p>11 Q. Would you say you interact with him on</p> <p>12 a daily basis?</p> <p>13 A. No.</p> <p>14 Q. Would you say you are available to him</p> <p>15 on a daily basis?</p> <p>16 A. Yes. To some extent.</p> <p>17 Q. And how do you normally communicate</p> <p>18 with him?</p> <p>19 A. Text, phone conversations, e-mails.</p> <p>20 Q. And he lives in Austin as well,</p> <p>21 correct?</p> <p>22 A. Yes.</p> <p>23 Q. Do you communicate with anyone at the</p> <p>24 national office of the NAACP?</p> <p>25 A. Yes.</p>

30

1 Q. And who would you say you communicate
2 with?

3 A. People in membership, branch and field
4 services, youth and college division, finance.

5 Q. What is the branch and field services?

6 A. The branch and field services would be
7 the department that would oversee the operation
8 of our units throughout the country.

9 Q. How much time a week, generally, do you
10 spend fulfilling your duties as secretary of the
11 Texas NAACP as opposed to your other job in real
12 estate?

13 A. That actually would vary, Mr. Tatum.
14 Let's just say I probably spend, on an average,
15 for the first six months of the year, probably 10
16 to 20 hours a week, and during convention
17 preparation, probably 40 hours a week.

18 Q. So at that point it almost becomes like
19 a full-time job?

20 A. Exactly. And it definitely has become
21 more so that in the last few years.

22 Q. As secretary, are you involved -- and I
23 think you may have said this -- are you involved
24 in finance matters with the Texas NAACP?

25 A. Yes, I am.

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1 state conference level. We're supposed to be
2 doing that function to grow the organization from
3 the ground.

4 Q. And what kind of activities are
5 involved with the recruiting and retention of
6 members at the branch level?

7 A. The branch had various events, whether
8 it's membership recruitment at churches or
9 events. They also send out solicitation, some
10 branches do and some don't. So there is not a
11 real consistent way that they go about doing the
12 recruiting other than the fact that they do.

13 Q. Now, you mentioned fundraising. What
14 would you say is the primary source of funding
15 for the Texas NAACP?

16 A. I would say it would definitely be
17 corporate support and sponsorship.

18 Q. Are you involved with soliciting
19 corporate support and sponsorship?

20 A. Yes, I am.

21 Q. And what does that involve?

22 A. Letter writing, for the most part.
23 Phone calling. Following up with information
24 needed for sponsorship.

25 Q. Do you know roughly how many -- when

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1 Q. Including budgeting and any other kind
2 of financial matters?

3 A. Probably more in the area of
4 fundraising. I also am responsible for execution
5 of vouchers for reimbursement of expenditures.

6 Q. Reimbursement of expenditures by Texas
7 NAACP employees?

8 A. Also for some of the volunteers who may
9 be functioning in the capacity of our state
10 conference doing various tasks.

11 Q. And do you participate in the
12 organization or -- let me state that again.

13 Do you participate in the
14 organization of these volunteers that you refer
15 to?

16 A. Yes. I would think to some degree.

17 Q. How does the Texas NAACP attract new
18 members?

19 A. Again, the Texas NAACP does not have
20 members. The units would be attracting new
21 members. In the past, and not so much recently,
22 we have done a number of different things to
23 assist the branches in membership recruitment and
24 retention, which is a very important piece of
25 what it is we're supposed to be doing on the

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1 you combine all of the members of the various
2 branches that make up the Texas NAACP --

3 A. Um-hum.

4 Q. -- do you know how many members that
5 includes?

6 A. I would say approximately 10,000.

7 Q. Do you recall when you began your role
8 as secretary what the membership was then,
9 generally?

10 A. No.

11 Q. Do you think it's increased over the
12 years?

13 A. I'll be honest with you. I'm not
14 really certain of that. Again, because we do not
15 have membership rosters, so I wouldn't know that,
16 really.

17 Q. Do the local branches keep membership
18 rosters?

19 A. Um-hum. Yes, they do.

20 Q. Do the local branches submit any kind
21 of report or summaries of their activities or
22 memberships to the executive committee?

23 A. They do submit quarterly reports that
24 are sent to the State Conference as well as to
25 the national office so they're required

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1 constitutionally.

2 There is no reporting of their
3 membership totals to us. That information is
4 held between the branches -- let me just say,
5 there are three different types of units that we
6 deal with. We have branches which are the adult
7 units. We have youth council which are
8 individuals under the age of 18, usually high
9 school or middle school students, and then we
10 have college chapters which is just what it says.
11 Students who are in college.

12 Q. Um-hum.

13 A. So that information is contained --
14 their membership is contained within those units.
15 Their memberships are solicited and forwarded to
16 the national office. It has to go up the ladder
17 to the national office in order to obtain a
18 membership in the organization. It's not
19 created. That membership is not created on the
20 local level or the State Conference level, which
21 is the intermediary in this hierarchy.
22 So that information is held by the
23 units in the national office. We are in there
24 just to assist the units as the first stop along
25 the way.

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1 kind of events, the executive committee, the
2 Texas State Conference, they are in charge of
3 supervising the organization of those activities.

4 A. You're correct.

5 Q. Okay. Does the Texas State
6 Conference -- let me rephrase.

7 Do the local branches of Texas --
8 let me say that again.

9 Do the Texas branches of the
10 National NAACP share the same missions -- mission
11 statement and goals as the National NAACP?

12 A. Yes.

13 Q. Okay. They don't have any separate
14 mission statements, goals or values apart from
15 the National NAACP?

16 A. No, sir, they do not.

17 Q. Miss Lydia, do you know what this
18 lawsuit is about?

19 A. Yes, sir.

20 Q. Can you tell me your understanding of
21 what this lawsuit is about?

22 A. It's in response to Senate Bill 14.

23 Q. And when you say "Senate Bill 14," you
24 mean Senate Bill 14 passed in 2011?

25 A. Exactly.

35

1 Q. When you say "we," you mean the Texas
2 State Conference?

3 A. Yes.

4 Q. So the Texas State Conference, which is
5 made up of the executive committee --

6 A. Um-hum.

7 Q. -- acts as kind of a supervising or
8 governing body of the local branches; is that
9 correct?

10 A. Yes.

11 Q. Okay.

12 A. But let me add, with the ultimate
13 programming and any other ultimate decisions are
14 done on the national level. We supervise them in
15 an intermediary status.

16 If, in fact, they do not feel that
17 our supervision is appropriate, then they
18 obviously have a right to go to the national, and
19 they have the final word. The national office
20 always has the final word because they are the
21 origin of the membership.

22 Q. All right. But when it comes to
23 organizing events, such as you mentioned
24 quarterly meetings, you mentioned a state
25 convention, when it comes to organizing those

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1 Q. You said it's in response to Senate
2 Bill 14, correct?

3 A. Yes, sir.

4 Q. And from here on out, I'll just refer
5 to it as SB 14, is that okay?

6 A. That's great.

7 Q. Okay. Can you elaborate on "in
8 response to SB 14." What does that mean?

9 A. It is the bill that required voters in
10 the state of Texas, in addition to having their
11 voter registration card, that they had to have
12 some form of pictured ID in order to vote in the
13 electoral process in the state.

14 Q. Do you know what those forms of photo
15 ID required by SB 14 are?

16 A. I think I could probably get most of
17 them. Passport, a right to carry card.

18 Q. By that do you mean concealed handgun
19 license?

20 A. Exactly. A driver's license, an EIC,
21 and there's one other -- or there's two others.
22 Let me think about it. Passport . . . I'm
23 sorry, I can't come up with the others.

24 Q. Is one of those forms that you did not
25 come up with a personal ID card with a photograph

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1 on it?
 2 A. If you're talking about the EIC
 3 card . . . Is that what you're talking about?
 4 Or are you talking about the DPS identification
 5 card?
 6 Q. I'm not talking about an EIC. I am
 7 talking about the DPS identification.
 8 A. Yes, I'm sorry. That was one of them,
 9 yes.
 10 Q. And is another one an unexpired
 11 military ID was one of them.
 12 A. Exactly. That's the sixth one.
 13 Q. Okay.
 14 A. Exactly.
 15 Q. What is an EIC?
 16 A. Your Election Identification
 17 Certificate that you can go to DPS and acquire if
 18 you are trying to register to vote and you need
 19 identification and you don't have the other
 20 documentation.
 21 Q. Of those forms of ID that you just
 22 listed, do you have any of those forms of ID?
 23 A. I have a Texas driver's license and I
 24 also have a passport.
 25 Q. And those are both unexpired as of

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1 A. That impact is the burden of acquiring
 2 an additional piece of identification when we
 3 were operating with a voter's registration card.
 4 And I guess in most states they still will
 5 operate with a voter registration card, as the
 6 only piece of identification needed to vote.
 7 Q. Miss Lydia, are you aware that the
 8 United States is a party to this lawsuit
 9 represented by the Department of Justice?
 10 A. Yes.
 11 Q. Is it the position of the Texas NAACP
 12 that the United States does not adequately
 13 represent its interest in this lawsuit?
 14 MS. RUDD: Objection --
 15 A. I really couldn't --
 16 MS. RUDD: Sorry. Objection calls
 17 for a legal conclusion. You can answer.
 18 A. I really couldn't answer that question.
 19 Q. (BY MR. TATUM) Miss Lydia, in joining
 20 this lawsuit, is the Texas NAACP representing the
 21 rights of itself as an organization?
 22 A. Its rights as an organization for its
 23 members, yes.
 24 Q. So it's representing the rights of the
 25 members of the local branches?

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1 today?
 2 A. Yes, sir.
 3 Q. Miss Lydia, do you vote?
 4 A. Yes, I do.
 5 Q. When was the last time that you voted?
 6 A. In the last election we had about two
 7 weeks ago.
 8 Q. Miss Lydia, have you ever been unable
 9 to vote because of the requirements of SB 14?
 10 A. No.
 11 Q. Have you ever been unable to vote for
 12 any other reason?
 13 A. No.
 14 Q. Miss Lydia, why do you choose to vote?
 15 A. It is an absolute right that we have
 16 earned and very hard-fought earned. So I feel a
 17 strong sense of responsibility to vote for those
 18 people who did make those valiant efforts to open
 19 those doors for us to vote. Because for many
 20 years we were denied the right to vote.
 21 Q. Miss Lydia, why did the Texas NAACP
 22 join this lawsuit?
 23 A. Because of the impact it will have on
 24 minorities.
 25 Q. And what is that impact?

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1 MS. RUDD: Objection. Misstates
 2 testimony.
 3 MR. TATUM: Let me rephrase.
 4 Q. (BY MR. TATUM) In joining this
 5 lawsuit, is the Texas NAACP representing its
 6 members -- or the members of the local branches?
 7 A. I would say yes.
 8 Q. Okay. Do you know if any of the
 9 individual members of the Texas NAACP branches
 10 sought to obtain counsel on their own to join
 11 this lawsuit?
 12 A. Not to my knowledge.
 13 Q. Is legal representation a benefit of
 14 being a member of the NAACP?
 15 A. In some cases.
 16 Q. Stated another way, does the Texas
 17 NAACP offer legal representation to its members?
 18 A. In some cases.
 19 Q. And what cases are those, normally?
 20 A. Well, I think this particular complaint
 21 would be the best example.
 22 Q. Are there any other examples you can
 23 think of?
 24 A. I'm sure there are others, but I'm
 25 sorry, it's not at the top of mind right now --

<p style="text-align: right;">42</p> <p>1 top of my mind right now.</p> <p>2 Q. Miss Lydia, how was the decision made</p> <p>3 to join or initiate this lawsuit?</p> <p>4 MS. RUDD: And I just want to</p> <p>5 caution you, Linda, not to reveal anything that</p> <p>6 might have been discussed in conversations with</p> <p>7 attorneys, including Mr. Bledsoe.</p> <p>8 A. I'm not sure.</p> <p>9 Q. (BY MR. TATUM) Was there a meeting to</p> <p>10 discuss the possibility of joining this lawsuit?</p> <p>11 A. Not sure of that either.</p> <p>12 Q. Did you attend any meetings where the</p> <p>13 topic of joining this lawsuit was discussed?</p> <p>14 A. There would have been an approval by</p> <p>15 our executive committee.</p> <p>16 Q. And you're on the executive committee,</p> <p>17 correct?</p> <p>18 A. Yes, I am.</p> <p>19 Q. Okay. Do you recall approving -- or do</p> <p>20 you recall when the executive committee approved</p> <p>21 the initiation of this lawsuit?</p> <p>22 A. I have no idea, but it would have had</p> <p>23 to predate the actual filing.</p> <p>24 Q. Of course. I'm talking now about the</p> <p>25 period of time before this complaint was filed.</p>	<p style="text-align: right;">44</p> <p>1 Q. At the Texas level, did that approval</p> <p>2 come in the form of a vote?</p> <p>3 A. Yes, sir.</p> <p>4 Q. And who participated in that vote?</p> <p>5 A. The executive committee members.</p> <p>6 Q. And was it on a -- was approval based</p> <p>7 on a majority of the vote?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Did you vote?</p> <p>10 A. I'm sure -- I probably was taking</p> <p>11 minutes, to be quite honest with you.</p> <p>12 Q. You were taking minutes of the meeting</p> <p>13 at which a decision to join this lawsuit was</p> <p>14 approved; is that correct?</p> <p>15 A. That would -- that would be correct.</p> <p>16 Q. Was anyone else, besides those on the</p> <p>17 executive committee, present at that meeting?</p> <p>18 A. No. Would not have been.</p> <p>19 Q. It would have been solely the executive</p> <p>20 committee?</p> <p>21 A. Yes, sir. And they would have been the</p> <p>22 only individuals who could have voted on it.</p> <p>23 Q. Was the meeting at which this vote or</p> <p>24 approval took place, was that meeting publicized</p> <p>25 to the Texas NAACP membership?</p>
<p style="text-align: right;">43</p> <p>1 During that time, do you recall when the decision</p> <p>2 was made to join this lawsuit?</p> <p>3 A. I'm sorry, I don't. Not the date. I</p> <p>4 could not even begin to speculate on that.</p> <p>5 Q. But am I correct in saying that the</p> <p>6 decision -- or the initiation of this lawsuit by</p> <p>7 the Texas NAACP would have to have been approved</p> <p>8 by the executive committee; is that correct?</p> <p>9 A. Yes, that's correct.</p> <p>10 Q. And you were on the executive</p> <p>11 committee, correct?</p> <p>12 A. Yes, sir.</p> <p>13 Q. But you do not recall any instance when</p> <p>14 that approval was made; is that correct?</p> <p>15 A. I don't recall the exact date that it</p> <p>16 was made -- or it was approved, I think is what</p> <p>17 you said.</p> <p>18 Q. But the initiation of this lawsuit was</p> <p>19 approved by the executive committee; is that</p> <p>20 correct?</p> <p>21 A. Yes, sir. It was approved by the</p> <p>22 executive committee and also it would have had to</p> <p>23 have been approved by the national office of the</p> <p>24 NAACP. Both would have had to be obtained prior</p> <p>25 to filing.</p>	<p style="text-align: right;">45</p> <p>1 A. No. And let me add something to this.</p> <p>2 Some of this -- this meeting could have very</p> <p>3 well -- that's why I'm hesitating to say when it</p> <p>4 happened. This could have been via a conference</p> <p>5 call of the executive committee and only those</p> <p>6 individuals would have been invited to the call</p> <p>7 and would have been allowed to vote. So -- or we</p> <p>8 could have sent it out. You know, I'm not really</p> <p>9 certain, okay?</p> <p>10 So it's not that I'm trying to be</p> <p>11 evasive. It's just that I don't know.</p> <p>12 Q. Okay. Was the membership -- was the</p> <p>13 Texas NAACP membership aware that such a vote was</p> <p>14 taking place?</p> <p>15 A. You're talking about the people outside</p> <p>16 of the executive committee?</p> <p>17 Q. Exactly.</p> <p>18 A. I doubt it.</p> <p>19 Q. Was any kind of input or concerns of</p> <p>20 the membership considered in making the vote to</p> <p>21 join this lawsuit?</p> <p>22 A. Most definitely.</p> <p>23 Q. And in what form was that input? Was</p> <p>24 it letters? Phone conversations with the</p> <p>25 membership?</p>

<p style="text-align: right;">46</p> <p>1 A. I would say both, and we have had like 2 legislative days when we would go over bills that 3 are pending approval or that have been approved. 4 And at those sessions people would discuss the 5 impact of legislation of this nature or other 6 bills that were pending or that have been passed 7 that they felt would be akin to them. 8 Q. At the executive committee level -- and 9 let me stop here for a second. The executive 10 committee -- as briefly as you can, tell me who 11 makes up the executive committee. 12 A. Sure. Our elected adult officers, the 13 president and secretary of the youth and college 14 division, which is actually a separate division 15 of our State Conference, and all of the standing 16 committee chairs. There -- I think we may have 17 as many as 15 standing committee chairs, so they 18 would comprise the executive committee. 19 Q. Is -- are the identities of the 20 executive committee members, is that available to 21 the public anywhere? For instance, on the -- 22 sorry. For instance, on the Texas NAACP website? 23 A. I'm not even sure our website is up, so 24 I'm going to be really hesitant to answer that 25 one. I'm not positive, but I know our membership</p>	<p style="text-align: right;">48</p> <p>1 you want to ask about the subject matter without 2 getting into any discussions that were had, I'm 3 perfectly fine with that. 4 MR. TATUM: Okay. Let me rephrase 5 the question. 6 Q. (BY MR. TATUM) Was the -- at this 7 meeting, where the joining of this lawsuit was 8 voted on and approved, was the topic of the 9 resources involved in litigating a case like this 10 discussed? 11 A. I really don't recall that. 12 Q. If it were discussed, would it be 13 contained in the minutes that you were keeping at 14 this meeting? 15 A. Yes. 16 Q. Where are those minutes held or where 17 are they filed? 18 A. In our State Conference office. 19 Q. Okay. Are those publicly available? 20 A. No. 21 Q. In any of the discussions leading up to 22 the filing of this lawsuit by the Texas NAACP, 23 were there any discussions or meetings held with 24 the -- with any other party to this lawsuit? 25 A. If there were any meetings or</p>
<p style="text-align: right;">47</p> <p>1 in the branches would know because we -- for 2 example, we have a criminal justice chair on the 3 state conference level. We also have a criminal 4 justice chair in our branches and youth councils 5 and college chapters. And so they provide some 6 leadership and programmatic kinds of input to 7 those individuals to assist them. And that would 8 be true of all of our standing committee chairs. 9 Q. Okay. Going back to the meeting of the 10 executive committee where the topic of joining 11 this lawsuit was discussed -- 12 A. Um-hum -- 13 Q. -- and ultimately approved -- 14 A. Um-hum. 15 Q. -- was there any discussion about the 16 resources involved in litigating a case like 17 this? 18 MS. RUDD: And I'm going to object 19 on the basis of attorney/client privilege and 20 instruct the witness not to answer. 21 MR. TATUM: Just to be clear, are 22 you objecting on the basis of the topic or the 23 content of -- 24 MS. RUDD: Okay. So that's a good 25 clarification. I'm objecting to the content. If</p>	<p style="text-align: right;">49</p> <p>1 discussions, I'm not -- I wasn't involved in them 2 and would not be aware of them. 3 Q. Who would be involved in that kind of 4 meeting? 5 A. I'm not sure. 6 Q. Would it be someone at the executive 7 committee level? 8 A. Well, I'm sure our president would have 9 been involved. And perhaps our staff person, who 10 is our legislative liaison. I'm not certain of 11 whom else would be involved. You know, I can 12 speculate about it, but I wouldn't know for 13 certain. 14 Q. Do you know if the Texas NAACP had any 15 kind of meetings or discussions with the Mexican 16 American Legislative Caucus leading up to the 17 initiation of this lawsuit? 18 A. I have no idea, but I just noticed on 19 this that there was something about the Hispanic 20 community. So I would tend to think based on 21 what I've read that, yes, there was and from 22 reading this, yes, I would say definitely there 23 was. 24 Q. Have you yourself as secretary had any 25 communications with the Mexican American</p>

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1 Legislative Caucus?
 2 A. Not in an official capacity.
 3 Q. Did you have any communications with --
 4 and I'll just call them MALC -- in any other
 5 capacity?
 6 A. I assisted in planning a meeting during
 7 the legislative session. But beyond that, no.
 8 Q. And what was that meeting about?
 9 A. It was a dinner. It was just a dinner.
 10 Q. Do you recall what legislative session
 11 that was?
 12 A. It would have been the last session.
 13 Q. In 2013?
 14 A. No. Actually would have been -- yeah,
 15 it would have been 2'13. Yes. It would have
 16 been 2'13.
 17 Q. Do you know if the Texas NAACP had any
 18 meetings or discussions with the Texas League of
 19 Young Voters leading up to the initiation of this
 20 lawsuit?
 21 A. No knowledge of that.
 22 Q. Okay. Do you know if the Texas NAACP
 23 had any kind of meetings or discussions with any
 24 other organization or group leading up to the
 25 initiation of this lawsuit?

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1 Q. You mentioned Lobby Day.
 2 A. Um-hum.
 3 Q. What is Lobby Day?
 4 A. Lobby Day is where we have our units.
 5 We all gather in the Austin area, and we have an
 6 education chair who will identify bills that are
 7 being proposed or pending passage that will
 8 impact education in our state.
 9 We have our political action chair
 10 who will address those that are impacting
 11 political action. With the various standing
 12 committees, they pretty much will coordinate --
 13 (Phone interruption.)
 14 MR. TATUM: I'm sorry.
 15 THE WITNESS: That's okay.
 16 A. -- the concerns of their standing
 17 committee.
 18 We have criminal justice.
 19 We have education.
 20 We have political action.
 21 We have youth initiatives.
 22 So it covers the full-spectrum of
 23 what's going on in our communities.
 24 Q. (BY MR. TATUM) And who's in charge of
 25 organizing Lobby Day?

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1 A. No knowledge.
 2 MR. TATUM: Are you -- is everyone
 3 all right as far as -- do we need to take a
 4 break?
 5 MS. RUDD: I'm fine.
 6 Are you okay, Linda, or do you need
 7 a break?
 8 THE WITNESS: I'm good.
 9 Q. (BY MR. TATUM) Miss Lydia, you
 10 mentioned the Texas NAACP's involvement with
 11 various activities at the Texas legislature.
 12 A. Um-hum.
 13 Q. Can you tell me a little bit more about
 14 that.
 15 A. Beyond the Lobby Day, I know that
 16 Yannis works almost full-time during the
 17 legislative -- well, he does work full-time
 18 during the legislative session contacting
 19 representatives and carry forth the mission.
 20 That's probably the extent of it.
 21 Q. What is the mission that you just
 22 referred to?
 23 A. Ensuring justice and equality for
 24 people of color and monitoring the bills and
 25 measures that are impacting our community.

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1 A. It's sort of a combined effort of our
 2 State Conference president, myself and Yannis. I
 3 would say we were the three main players in
 4 orchestrating that.
 5 Q. Does the Texas NAACP hold a Lobby Day
 6 during every legislative session?
 7 A. I think we've done that fairly
 8 consistently.
 9 Q. Dating back as far as your involvement?
 10 A. I would -- not that far, but maybe at
 11 least for the last eight years.
 12 Q. Does the Texas NAACP, during the
 13 legislative session, hold any meetings at the
 14 capitol?
 15 A. Meetings at the capitol. . . During
 16 the Lobby Day?
 17 Q. Outside of Lobby Day.
 18 A. I'm sure that there are meetings that
 19 bleed out from, you know, the Lobby Day, like our
 20 health committee chair may have meetings with
 21 someone in the Department of Health or -- that
 22 are specific to something that's going on in the
 23 legislature. So, I mean, I couldn't say for
 24 certain, but I think I have heard of them having
 25 some meetings, but I don't know specifically.

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1 Q. Does Mr. Banks or anyone on his behalf
2 meet specifically with individual legislators?
3 A. I'm pretty certain he would.
4 Q. Have you yourself ever provided
5 testimony regarding any bill during a legislative
6 session?
7 A. No.
8 Q. If the Texas NAACP were to offer
9 testimony at a legislative session, who would do
10 that?
11 A. It would depend on the legislation.
12 Q. Any kind of voter ID legislation? Who
13 would typically give testimony regarding such
14 legislation?
15 A. Probably Yannis. Gary, perhaps. Our
16 political action chair, Mr. Jefferson.
17 Q. What is his name?
18 A. Howard Jefferson.
19 Q. Howard Jefferson?
20 A. Um-hum.
21 Q. And he is the political action chair of
22 the Texas NAACP?
23 A. That's correct.
24 Q. And what is his job? What is the job
25 of -- what is a political action chair

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1 What are the various standing committees?
2 A. I'm going to try to give you all of
3 them, but I can't promise you I'll come through
4 with all of them. I've had a lot of chemo.
5 Q. Give me as many as you can recall.
6 A. Okay. Political action.
7 Criminal justice.
8 Youth work.
9 ACT-SO.
10 Education.
11 Finance.
12 Communications. Let's see. What
13 else?
14 Housing.
15 Press and publicity.
16 Economic development.
17 That's just -- I can't think of any
18 others. I'm sure there are lots more.
19 Q. And those are standing committees
20 within the Texas NAACP?
21 A. Yes.
22 Q. Are you aware of any of those standing
23 committees conducting any kind of polls or
24 surveys of Texas NAACP members regarding voter ID
25 legislation?

55

1 responsible for?
2 A. Political concerns impacting the
3 minority community and others.
4 Q. And what kind of activities does that
5 involve?
6 A. Well, obviously monitoring legislative
7 measures, providing guidance and programmatic
8 information or programmatic designs for the units
9 to implement.
10 Q. How long has that position existed?
11 A. I would think since the national
12 created it. The national office, you have to
13 understand, creates these standing committees.
14 It's done on our national board level.
15 Q. During the legislative session, does
16 the Texas NAACP conduct any kind of polls or
17 surveys of its members?
18 A. Regarding?
19 Q. Regarding legislation that might affect
20 the Texas NAACP?
21 A. I think that would be done within our
22 committees. We would not do it as a whole. I
23 think the committees, the standing committee
24 chairs.
25 Q. You mentioned the standing committees.

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1 A. No personal knowledge of that.
2 Q. Can you tell me about the activities of
3 the Texas NAACP, specifically with regard to the
4 enactment of SB 14?
5 A. Okay. We did have a Lobby Day, and it
6 was discussed. The Bill itself was handed out.
7 We were given talking points so that when we go
8 to visit the different legislators that -- each
9 of our units are from all across the state,
10 they're statewide, so they have various and
11 different legislators. So they would go and
12 speak with them regarding supporting our
13 positions.
14 Q. Any other activities outside of Lobby
15 Day?
16 A. We would send out updates if there was
17 some movement and perhaps needed individuals to
18 talk with their legislators again. We would send
19 out information asking them to do that.
20 Q. With regard to any of the activities
21 that you've just described, does the Texas NAACP
22 coordinate with other groups such as MALC or the
23 Texas League of Young Voters?
24 A. I really have no knowledge of them
25 coordinating directly with those groups, and I've

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1 -- I've heard the names of the groups before, but whether or not they're coordinating with them, I have no know -- no direct knowledge of that.

Q. During the legislature that enacted SB 14 --

A. Um-hum.

Q. -- are Texas NAACP members or members of the branches encouraged to express their concerns or any issues they have to the executive committee or anyone else at the Texas NAACP?

A. Yes.

Q. And how would they do that?

A. Probably just e-mails.

Q. Do you read those e-mails? Or do you compile those communications?

A. I -- unfortunately I cannot read every e-mail that I get or I would never do anything else. Things that are germane to specific committee chairs, that information is usually forwarded on to them for handling or whatever.

Q. But you do, to some extent, review communications of members with the Texas NAACP; is that correct?

A. I do see some of them, yes. I don't see all of them. Please understand --

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A. I would think a lot. I couldn't tell you the exact amount. Just thinking of the salary that we pay Yannis and his activities has almost been exclusively dedicated to the legislature and that was not the original intent of his position.

Q. What was the original intent of his position?

A. He would handle a large amount of administrative work. We have a lot of civil rights complaints that far exceeds legislative concerns that need to be addressed almost on a day-to-day basis.

Q. Are the resources expended towards legislative activities? Are those -- is that something that is budgeted for?

A. You know, you used that term before about budget. I guess -- I guess the -- the -- the reality of it is, our resources are not that vast that we have an operational budget like, say, maybe an AT&T or a 7-Eleven Southland Corporation.

We expend our resources where they're needed and it's more -- oftentimes it's more reactive where budget sounds more proactive,

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Q. Sure.

A. -- that everybody knows who the standing committee chairs are. If they have an education issue, they know whom to contact. They have -- we provide them with that information.

Q. Okay. Are you aware of any studies or reports or analyses that were considered by the Texas NAACP in their involvement or participation in the enactment of SB 14?

A. No.

Q. Any studies or reports that any talking points developed by the Texas NAACP were based on?

A. I'm not sure. I do not develop -- I did not develop the talking points, so I couldn't say what they use to create them.

Q. Who did develop the talking points?

A. I would think -- I would think maybe Yannis. Political action chair.

Q. Mr. Jefferson?

A. Yeah, Mr. Jefferson.

Q. What kind of -- what kind of resources of the Texas NAACP are spent on activities such as Lobby Day or any other kind of legislative-related activities?

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in my mind, that people can sit down and say, we're going to spend \$500 for educational concerns and 500 -- no. We don't do that. We don't compartmentalize like that.

Q. So the Texas NAACP -- let me ask you: Does the Texas NAACP compile an annual budget every year?

A. Our treasurer will put together something. But to be quite honest with you, as far as actually -- I mean, we have certain dollars that are set aside for certain purposes. Example, we have a historical project going on --

Q. Um-hum.

A. -- and we have a certain dollar amount that has been designated for that. We have a certain dollar amount for youth and college, and we do not veer into those lanes because we have those set aside for them. But the rest of the dollars are just basically operating funds.

Q. And are those operating funds allocated as on a need basis? You mentioned where they're needed --

A. Um-hum.

Q. -- are they allocated when and where they're needed?

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1 A. That's pretty much it.
 2 Q. And who makes those decisions?
 3 A. Our executive committee.
 4 Q. Is that a similar voting approval
 5 process?
 6 A. Yes.
 7 Q. Does the National NAACP have any input
 8 into the allocation of funds at the state level?
 9 A. No.
 10 MR. TATUM: Could we go off record.
 11 (A recess was taken.)
 12 MR. TATUM: All right. Let's go
 13 back on the record.
 14 Q. (BY MR. TATUM) All right. Miss Lydia,
 15 we were talking about operational funds which you
 16 stated were specifically designated for certain
 17 purposes, and you don't -- I believe you said you
 18 don't veer into those roads; is that correct?
 19 A. Um-hum.
 20 Q. Okay. And you mentioned other funds of
 21 the Texas NAACP that are allocated on an
 22 as-needed basis --
 23 A. Um-hum.
 24 Q. -- is that a correct summarization of
 25 what your testimony was?

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1 were needed to address it?
 2 A. Definitely. Our national president
 3 actually came down for that event.
 4 Q. Was a similar decision made regarding
 5 addressing SB 14?
 6 A. Yes, I think I've already stated that,
 7 that it was approved and we had to redirect
 8 resources to address this because of the
 9 egregious nature of the bill.
 10 Q. Did the national president come down
 11 for that decision?
 12 A. I know he was involved in some of it,
 13 perhaps. And I'm not certain of that. Let me
 14 just back out of that.
 15 Q. What kind of things does the executive
 16 committee look at when deciding if and how -- or
 17 if and what percentage of funds should be
 18 allocated towards addressing a specific need like
 19 SB 14?
 20 A. I'm not going to say that they
 21 specifically say a dollar amount, but they
 22 approve the resources for us to move forward with
 23 trying to address what they consider as something
 24 that would be punitive to our community, whether
 25 it's with education, or whether it's with

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1 A. Yes.
 2 Q. Okay. Do these as-needed funds, are
 3 those allocated in such a manner during every
 4 year? Is that something that occurs every year
 5 or is that something if there's no pressing need
 6 you don't allocate anything for a specific need?
 7 Does that make sense?
 8 A. Yeah, that makes sense. Yes. And no.
 9 Example, when the issue of changing the textbooks
 10 in Texas came up, funds were shifted to the
 11 education committee so that they could conduct
 12 needed activities to advocate in the interest of
 13 our membership -- or I should say their
 14 membership.
 15 Q. Do you recall when that textbook issue
 16 was?
 17 A. I honestly have the worst things with
 18 numbers. That's the part that the chemo took
 19 out. I really don't know. I have the hardest
 20 time remembering that, but I do remember
 21 attending the session or a couple of sessions in
 22 Austin regarding that.
 23 Q. And regarding that issue, was it the
 24 decision of the executive committee in response
 25 to that issue to divert whatever amount of funds

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1 political action or health issues. It varies.
 2 Q. And did that decision-making process
 3 vary from previous allocations of resources and
 4 response to other issues like the Texas
 5 schoolbook/textbook issue that you mentioned
 6 before?
 7 A. I'm not sure I understand your
 8 question. I'm sorry.
 9 Q. Sure.
 10 You mentioned that a decision was
 11 made to allocate specific resources to address
 12 the schoolbook issue, correct?
 13 A. Um-hum.
 14 Q. Okay. Was the process that led to that
 15 allocation, was that generally the same kind of
 16 process that led to the allocation of resources
 17 to address SB 14-related issues?
 18 A. Yes.
 19 Q. Okay. Going back to the legislative
 20 process that led to the enactment of SB 14, does
 21 the Texas NAACP contend that SB 14 was enacted
 22 through a process marked by departures from
 23 normal legislative procedures?
 24 A. I think that was -- that was a -- yes.
 25 I would say yes to that.

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1 Q. Can you tell me in what ways the
2 legislature diverted from normal procedures in
3 the enactment of SB 14?
4 A. Well, rules were changed for passage by
5 the legislators.
6 Q. Do you know what specific rules were
7 changed?
8 A. If I'm not mistaken, it was from
9 two-thirds to just a simple majority vote was
10 changed in order to enact it.
11 I think the process for fast-pacing
12 the bill, the way it was handled in committee, a
13 special committee was formulated specifically.
14 I think there were a number of
15 things that were done to ensure the passage of
16 that bill.
17 Q. Were any of these things -- and by
18 "things," I believe you mean the --
19 A. Measures.
20 Q. -- measures, rule changes, procedural
21 changes, were any of those -- were any of those
22 things done outside, in your opinion -- let me --
23 let me back out.
24 Does the Texas NAACP contend that
25 the legislature in enacting SB 14 acted out of

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1 recommendations that could perhaps be used to
2 amend the scope of this bill. I know there were
3 other people who were interested in speaking, but
4 due to time constraints, it didn't happen.
5 Q. Does the Texas NAACP feel that its
6 voice was not adequately heard concerning SB 14?
7 A. I think the better answer would be,
8 your question, do we feel that our
9 recommendations were not listened to?
10 Q. Did you have ample opportunity to
11 present your recommendations?
12 A. You know, that takes us down a long
13 road when you ask that question, because like
14 myself, I am a volunteer. I am losing income as
15 I sit here today. And all of our people who are
16 in our units, whether they're branch presidents
17 or whatever capacity they may hold, they are all
18 volunteers. And so the process of supporting
19 yourself and your family does not always allow
20 you the leisure of going to Austin and waiting
21 for days, perhaps, to voice your concern.
22 We have, you know, obviously tried
23 to assist people in getting to Austin to provide
24 testimony and we have been successful in some --
25 with some -- the process of getting them there

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1 its permissible authority?
2 A. Not knowing exactly what is permissible
3 and not permissible, but I know that there were
4 some changes that were put in place that would
5 absolutely guarantee the passage.
6 Q. Does the Texas NAACP contend that those
7 changes were -- or does the Texas NAACP contend
8 that the legislature was not authorized to make
9 those changes?
10 A. No, I don't think that that is the
11 contention.
12 Q. Do you recall -- outside of SB 14, do
13 you recall any other bill for which similar
14 changes were made by the legislature?
15 A. Not to my knowledge.
16 Q. Did the Texas NAACP have the
17 opportunity to voice its concerns with SB 14 to
18 the legislature during that legislative session
19 and --
20 A. I do --
21 Q. Sorry. And I'm referring to the 2011
22 legislature.
23 A. I would venture to say that we only had
24 maybe one or two people who actually had an
25 opportunity to speak opposing or even providing

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1 and having them to provide testimony, not
2 necessarily that they were successful in changing
3 the outcome of the pending legislation, but I'm
4 not sure, the short answer I guess is. I'm not
5 sure if our voices were heard in its entirety or
6 not.
7 Q. Would you say that based on the
8 inherent nature of the Texas NAACP, they face --
9 you face certain challenges in getting your
10 message out and voice heard regarding specific
11 bills being proposed in the legislature?
12 A. I think we do have some challenges,
13 yes.
14 Q. And those challenges include kind of
15 what you were just talking about with regard to
16 getting volunteers mobilized and getting people
17 to the capitol and that kind of thing, correct?
18 A. Exactly.
19 Q. Okay. Do you believe that SB 14 is the
20 cause of some of those challenges that y'all
21 face?
22 A. Challenges in voting or I mean --
23 Q. I'm talk -- I'm talking about the
24 legislature, getting your voice -- participating
25 in the legislative process. You mentioned

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1 earlier that the Texas NAACP faces certain
 2 challenges in getting people to the capitol to
 3 testify and voice concerns about various bills;
 4 is that correct?
 5 A. Yes.
 6 Q. Okay. Are those -- do those challenges
 7 always exist?
 8 MS. RUDD: Objection; vague.
 9 A. I'm not sure that I could answer that,
 10 because we're involved in so many different
 11 things as it relates to civil rights and this is
 12 just one component.
 13 Q. (BY MR. TATUM) Okay. Did anyone at
 14 the Texas NAACP provide live testimony to the
 15 legislature regarding SB 14?
 16 A. I'm certain, yes.
 17 Q. During that live testimony, were any
 18 studies or data presented regarding the impact of
 19 SB 14?
 20 A. I really don't know. I wasn't there,
 21 nor do I have the transcript of the proceedings.
 22 Q. Do you recall any kind of meetings that
 23 were held to prepare for that live testimony?
 24 A. I have no knowledge of that.
 25 Q. Moving on to a different topic.

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1 A. That not only were you getting someone
 2 to fill out a voter registration card, you were
 3 also giving them information about SB 4 -- 14
 4 telling them, you know, that you need to make
 5 certain that the name on this voter registration
 6 card that you're filling out matches the name
 7 that's on your pictured ID identically, otherwise
 8 you may be denied the right to vote, so there was
 9 a lot more -- education normally came after the
 10 registration project. Notice I said voter
 11 registration, voter education, these are
 12 compartmentalized.
 13 Q. Um-hum.
 14 A. But voter registration and education
 15 became one at this point because of the nature of
 16 SB 14.
 17 Q. So --
 18 A. I'm sorry. In the new law.
 19 Q. So previously there was a -- there was
 20 one compartment within the organization of the
 21 Texas NAACP for voter registration purposes?
 22 A. Um-hum.
 23 Q. There was a separate compartment for
 24 voter education purposes; is that correct?
 25 A. Yes, sir.

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1 A. Okay.
 2 Q. Does the Texas NAACP engage in any
 3 activities related to voter registration?
 4 A. Definitely.
 5 Q. And what activities are those?
 6 A. We conduct voter registration drives.
 7 We have a complete voter empowerment initiative
 8 that includes voter registration, education,
 9 mobilization and voter protection. Those are the
 10 four components and this is something that we
 11 have had to really work a lot harder at, so to
 12 speak, because of the changes in the law
 13 regarding voting with the voter ID bill.
 14 We had to ensure that people were,
 15 one, aware that this had taken place, and we
 16 wanted our units to please educate their
 17 communities that this bill had become law, and
 18 that there were certain things that must be done
 19 that were different from what we had done
 20 previously in order for people to vote.
 21 Q. Specifically with regard to voter
 22 registration --
 23 A. Um-hum.
 24 Q. -- in what way did SB 14 change the
 25 activities of the Texas NAACP?

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1 Q. And is it your testimony that because
 2 of SB 14, those two compartments, as you describe
 3 them, have been merged into one?
 4 A. They've been merged into one and we
 5 still have an education component, but
 6 registration education -- well, it is now
 7 registration education, then it's another
 8 component of education still, okay, that involves
 9 issues that we need to be looking out for and --
 10 you know, and there is the mobilization,
 11 encouraging people to get out and vote, providing
 12 them with information about where their voting
 13 locations are, and then we always have a voter
 14 complaint hotline that we operate with attorneys
 15 or through the national office to address voter
 16 concerns during election.
 17 Q. To address voting concerns during any
 18 election?
 19 A. Um-hum, any election.
 20 Q. How long has the Texas NAACP been
 21 engaging in voter-registration-type activities?
 22 A. Since its inception.
 23 Q. Is that something the Texas NAACP has
 24 always done?
 25 A. Yes, sir.

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1 Q. Okay. And when you say -- when you're
2 talking about how it was previously just voter
3 registration and now it's voter registration
4 education --
5 A. Um-hum.
6 Q. -- what additional resources are
7 committed to the new compartment described as
8 voter registration education?
9 A. We had to provide printed material
10 about the changes. It's -- and obviously we were
11 instructing people, you know, that when you fill
12 out your voter registration card, make sure you
13 pull out your pictured ID that you're going to be
14 using, if you have one, that it matches that card
15 because of the discretionary power that a -- that
16 an election official has when it comes time to
17 vote.
18 If it does not match exactly, they
19 can decide that you're not the person that you
20 say you are or that your identifications, one or
21 the other, does not say -- says you are and you
22 could possibly be disqualified or be given a
23 provisional ballot which may or may not count,
24 depending on your actions later.
25 Q. Are the resources that are dedicated to

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1 have been added to the pot, so to speak.
2 Q. How has the Texas NAACP -- in the past,
3 prior to SB 14, how has the Texas NAACP allocated
4 resources to educate its members regarding other
5 changes to voter laws?
6 A. We've created postcards about when the
7 State enacted re-enfranchisement for felons who
8 were off paper. That was a piece that we would
9 hand out with voter registration cards to let
10 people know if they or family members were off
11 paper, no longer reporting to a probation or
12 parole officer, that they were now entitled to
13 vote again, so we created documents for that.
14 Q. So -- sorry.
15 A. That's okay. Go ahead.
16 Q. So did that process involve allocating
17 resources for making printouts and handouts and
18 fliers?
19 A. Yeah. We had -- we had a card, I just
20 told you. We created a card with another group
21 --
22 Q. Um-hum.
23 A. -- that we handed out with voter
24 registration cards just so that people were aware
25 of the law. Anytime you have any legislative

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1 voter registration/education, do those fall under
2 the category of set operating funds or the
3 as-needed funds that you were referring to
4 earlier?
5 A. Definitely going to be the as-needed
6 funds as a result of SB 14.
7 Q. So before SB 14 funds allocated for
8 registration activities, were those considered
9 operating funds?
10 A. I would think so. They're -- they're
11 -- they're both -- it all comes out of the
12 operating funds. Okay? I just think it's
13 required more effort and more financial resources
14 for printed material, voter registration has
15 become more of an education process, whereas
16 before it was just making certain that people
17 wrote legibly so that somebody could read the
18 registration card.
19 Now you're dealing with telling
20 people and providing them with information about
21 SB 14, where they can go and get an EIC, you
22 know, the fact that they need a birth
23 certificate, where you can go to get a birth
24 certificate if you need that for, you know, EICs
25 or whatever, so there are a number of pieces that

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1 changes we try to educate our community about
2 those legislative changes.
3 Q. And so the education of your members
4 regarding SB 14 is not the first time you've had
5 to educate your members regarding a change in
6 voter laws; is that correct?
7 A. No. But this is the most extensive
8 change we've ever had to make.
9 Q. And other than the printouts and the
10 new compartment that you already mentioned, in
11 what ways has the education of your members
12 regarding SB 14 been more extensive than with
13 previous changes in the law?
14 A. We have obviously been involved in this
15 litigation now for -- this was filed in, what,
16 2013, and during the legislative session, again
17 we were very actively involved in lobbying and
18 advocating against this bill. We have had to
19 do -- we have developed resources that we have
20 provided to our branches to hand out to people
21 during the registration process. We've had to
22 create information on where you can go and when
23 you can go and where the closest DPS office is,
24 the hours the DPS offices are open.
25 There is a whole plethora of things

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1 that have come about as a result of this bill
2 that we've never encountered on such a lengthy --
3 for such a lengthy period of time, because the
4 learning curve is still going on. We still have
5 people who show up to vote who do not realize
6 that they need these documents. Students don't
7 understand why a state-issued student ID is not
8 sufficive [sic] to vote when it's initiated by
9 the State as well.

10 Q. And so are these resources you're
11 allocating towards SB 14-related issues, that
12 includes resources dedicated to the ongoing
13 litigation of this lawsuit, correct?

14 A. Yes.

15 Q. Going back to you were talking about --
16 talking about funds, financial resources of the
17 Texas NAACP, and you mentioned -- and correct me
18 if I'm misstating any of this -- you mentioned
19 funds that are kind of set at the beginning of
20 the year that you don't touch. Have -- because
21 of SB 14, have you had to -- for lack of a better
22 word -- eat into any of those fund allocations?

23 A. No.

24 Q. Can you tell me what activities,
25 outreach activities, programming activities, any

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1 Q. Now, I didn't mention this earlier,
2 when we talk about members, members are not --
3 card-carrying members of the Texas NAACP are not
4 the only people that the Texas NAACP serves; is
5 that correct?

6 A. I'm sure there are lots of people who
7 would benefit, I would venture to say, from the
8 work of our association and I think that has --
9 that has history as well.

10 Q. So would you say that the Texas NAACP
11 has a constituent base that are not necessarily
12 members?

13 A. Yeah.

14 Q. Okay.

15 A. I would say that.

16 Q. Sorry. I should have clarified that
17 earlier.

18 Now, how specifically -- with
19 regard to educating its members regarding voting
20 laws, how specifically does the Texas NAACP
21 accomplish that purpose?

22 A. We provide them with updates on
23 legislature such as this. We send out
24 information regarding any irregularities or
25 things that have changed that would impact the

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1 kind of activity of the NAA- -- of the Texas
2 NAACP that it has -- that it usually conducts in
3 any given year. Can you give me examples of such
4 activities that have been allocated less
5 resources as a direct result of SB 14?
6 A. The utilization of Yannis Banks, our
7 one staff person, that has almost been -- I would
8 say he's gone from being in a position that was
9 60 percent administrative and he's now doing
10 probably 80 percent legislative as a result of
11 this bill.

12 Q. He was doing 60 percent administrative?

13 A. Um-hum. But he's no longer doing that
14 because he doesn't have the time.

15 Q. Could the Texas NAACP hire someone else
16 to make up for that lost time?

17 A. No. We can't afford that. Our pockets
18 are not that deep.

19 Q. Okay. You mentioned voter ID
20 education --

21 A. Um-hum.

22 Q. -- how long has the Texas NAACP been
23 educating its members regarding voter
24 requirements -- regarding voter laws in general?

25 A. Since its inception.

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1 voting in their specific cities.

2 Q. Do you hold any kind of workshops?

3 A. During our annual convention and we
4 definitely -- and we have actually, I guess,
5 spent a great deal of time during the last
6 convention dealing with this particular deal and
7 the impact that it would have in our community
8 and the things that we need to do, sort of a
9 mobilization effort on the part of the units to
10 implement different activities to educate our
11 community.

12 Q. And the state convention, is that an
13 annual event?

14 A. That is.

15 Q. Okay. When is it normally held?

16 A. The first or second weekend in October,
17 annually.

18 Q. And does it occur in different
19 locations across the state?

20 A. Absolutely.

21 Q. Do you remember where the last one was?

22 A. In Richardson.

23 Q. That would have been October 2013?

24 A. That's correct.

25 Q. Okay. And at that state convention,

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1 were workshops held meant to educate members
2 regarding the requirements of SB 2014?

3 A. Yes.

4 Q. Were workshops held for any other
5 purpose?

6 A. There were some other purpose, but the
7 majority of it was on SB 14.

8 Q. Do you recall where the state
9 convention was held in 2012?

10 A. Yes.

11 Q. And where was that?

12 A. Corpus Christi.

13 Q. And at the state convention in Corpus
14 Christi, were workshops held for the purpose of
15 educating Texas NAACP members regarding SB 14?

16 A. If I'm not -- if I'm not incorrect, I
17 don't think the bill had been passed, but I think
18 it had been -- I want to say that the enactment
19 of it had been delayed at that time. There was,
20 I'm sure, discussion about it, but I think there
21 had been some intervention.

22 Q. For clarification purposes, I'll
23 represent to you that the bill became effective
24 January 1st, 2012, and it was the subject of
25 litigation involving the preclearance process.

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1 A. Between 500 to 1,000.

2 Q. At these state conventions, do y'all
3 assist members with registering to vote or
4 obtaining forms of ID required to vote?

5 A. We actually considered it at the
6 Richardson convention --

7 Q. Um-hum.

8 A. -- but again, it was a weekend and DPS
9 is not operational on Saturdays or weekends.

10 Q. During those workshops, you educate
11 your members regarding the requirements of SB 14?

12 A. Yes, we do. And also, you know, the
13 ancillary things that -- like information on DPS
14 offices, the locations, the distances. We had a
15 number of counties that didn't even have a DPS
16 office. So, I mean, we would address and try to
17 deal with some of those concerns.

18 Q. At the 2013 conference in Richardson,
19 for example --

20 A. Um-hum.

21 Q. -- does the Texas NAACP feel it had the
22 necessary resources to hold an effective
23 workshop?

24 A. Yeah, I think we had the resources, but
25 we didn't have the ability to issue documents

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1 A. Um-hum.

2 Q. And that litigation was resolved --

3 MR. TATUM: And, Amy, correct me if
4 I'm wrong.

5 Q. (BY MR. TATUM) -- in the summer
6 of 2012, I believe.

7 MS. RUDD: (Witness nodded head.)

8 Q. (BY MR. TATUM) Just for edification
9 purposes.

10 A. Thank you. Well, then I'm -- okay.

11 Q. So getting back to the 2012 state
12 conference held in Corpus --

13 A. Um-hum.

14 Q. -- I'm sorry if I'm repeating the
15 question, but do you recall any workshops held
16 during that conference specifically to educate
17 members regarding the requirements of SB 14?

18 A. Yes.

19 Q. And what does such a workshop entail?
20 What kind of thing goes on those workshops?

21 A. Legislators perhaps will come in and
22 speak. Attorneys who would discuss the bill and
23 the impact that it would have and remedies.

24 Q. Do you know how many people attend
25 these state conventions, generally?

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1 that would be needed to actually enable someone
2 to vote if they did not have identification.

3 Q. Who sets the agenda for the state
4 conventions?

5 A. It's a collaboration between our state
6 conference president and the standing committee
7 chairs.

8 Q. Do you recall where the state
9 conference was held in 2011?

10 A. I think it was Austin.

11 Q. At that convention were workshops held
12 to educate members about the requirements of SB
13 14?

14 A. If it was pending legislation, I'm
15 sure. We always have a legislative session that
16 deals with pending bills that will impact our
17 community.

18 Q. Okay. So would you say that going back
19 to state conventions ten years ago, would you say
20 that at every one of those state conventions
21 there was some kind of workshop for the purpose
22 of educating members regarding voter laws?

23 A. Not consistent. I wouldn't think so
24 because we haven't had that many changes. Beyond
25 the re-enfranchisement, I can't think of anything

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1 else that we actually expended time or money to
 2 educate our community on. No, I can't think of
 3 anything.
 4 Q. Were workshops held during those
 5 conventions where voter ID laws weren't discussed
 6 or weren't the subject of workshops, were
 7 workshops held for other purposes?
 8 A. Yeah, we have workshops for a number of
 9 different purposes, but not necessarily for were
 10 we addressing voter education registration or any
 11 of those issues because there were no real issues
 12 at that time.
 13 Q. So every year is there some kind of
 14 process or some kind of meeting where the topics
 15 for the workshops to be held at the state
 16 convention are discussed and decided upon?
 17 A. Yes.
 18 Q. Okay. And the workshops, do they
 19 change from year to year based on pressing needs
 20 or matters?
 21 A. They change from year to year. For the
 22 most part, they're usually involved with branch
 23 operations, procedure from the national that may
 24 have changed. That has been the majority, until
 25 the last few years, of what our workshops

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1 A. Yes, that's correct.
 2 Q. Do you know if those kinds of documents
 3 have been produced in this litigation?
 4 A. I have no idea.
 5 Q. Okay. Does the Texas NAACP assist
 6 voters during elections?
 7 A. I'm not sure I understand exactly what
 8 you mean by "assist" them.
 9 Q. Does the Texas NAACP engage in any
 10 activities that assist its members or
 11 constituents in the voting process?
 12 A. As far as going into a voting booth and
 13 voting? I mean, I'm still not sure.
 14 Q. Well, no, that would be illegal.
 15 A. Yeah, that's what I'm sitting here
 16 thinking. It's like, God no.
 17 Q. Okay. I guess what I'm talking about,
 18 do they assist people in getting to voting
 19 places?
 20 A. Oh, you mean like rides to the polls?
 21 Q. Sure.
 22 A. Yeah, we -- we do that.
 23 Q. How long has the Texas NAACP been doing
 24 that kind of thing?
 25 A. Again, probably since its inception.

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1 consisted of. Quite honestly, the workshop in
 2 Richardson, and I'm saying this because I
 3 actually did have a member to say this. It was
 4 almost exclusively on this legislation and the
 5 impact it was going to have and the importance of
 6 what we needed to do to ensure the rights of
 7 people to vote.
 8 Q. These kinds of workshops and
 9 educational activities that the Texas NAACP
 10 engages in, do they occur outside of the state
 11 conventions; in other words, are there -- do they
 12 hold these kind of workshops in any other kind of
 13 forum or gathering?
 14 A. No, our units would do that.
 15 Q. The local branches would do that on
 16 their own?
 17 A. With their membership.
 18 Q. And are you aware that they hold such
 19 -- that they indeed have held such workshops at
 20 the local level?
 21 A. Some of them have, I'm sure.
 22 Q. For these state conventions, are there
 23 mass communications sent out to the membership,
 24 mailers, e-mails, that kind of thing, to let them
 25 know about the agenda?

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1 Q. Do they perform any kind of -- any
 2 other kind of assistive functions for early
 3 voting, absentee voting, does that apply to all
 4 phases of the voting process?
 5 A. I would think -- early voting in Texas,
 6 we try to encourage our membership to do early
 7 voting because of the simplicity of it or they
 8 can go anywhere in the county and vote versus
 9 having to show up at an assigned precinct to vote
 10 during the regularly scheduled election. So we
 11 do that for sure.
 12 We have super Sundays where our
 13 churches -- we join with our churches to try to
 14 help get people to go to the polls after
 15 services. We definitely want to impact voter
 16 turnout and that has been consistent.
 17 Q. What kinds of resources does the Texas
 18 NAACP expend towards these kinds of
 19 voter-assistance activities that you've talked
 20 about?
 21 A. I'm not sure of an exact amount. I
 22 don't think I could give you that.
 23 Q. Does the Texas NAACP employ the use
 24 of volunteers for these kinds of purposes?
 25 A. For the most part, it's strictly

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1 volunteer.

2 Q. As part of the assistance that Texas
3 NAACP provides to voters, does that include
4 helping voters gather the necessary documentation
5 to vote?

6 A. Some of our units may have. I'm not --
7 I'm not personally familiar with anyone who has
8 one of the units that has done something like
9 that. I'm not really for sure. But I know we
10 have encouraged them to assist their constituents
11 to -- to get the materials needed -- the
12 documents needed, whether it's a driver's license
13 or whether it's their birth certificate.

14 Q. In the election cycles that have
15 occurred after the implementation of SB 14 --

16 A. Um-hum.

17 Q. -- has Texas NAACP assisted voters
18 during those elections in the manner that you've
19 just described?

20 A. I'm sure we have.

21 Q. Did those activities require more or
22 less resources than for previous elections prior
23 to SB 14?

24 A. Definitely more.

25 Q. In what way?

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1 recruitment, now as part of their membership
2 recruitment events, they do provide information,
3 and they always have the registration cards, but
4 they now also have to provide -- they provide
5 information about SB 14 and the requirements of
6 that as a prerequisite to vote.

7 Q. Has the Texas NAACP in any way been
8 unable to fulfill its stated mission as a result
9 of SB 14?

10 A. No. I'd like to think that we're still
11 carrying out the mission of the NAACP. Maybe not
12 to the extent that we have done previously
13 because of the allocations of whether it's
14 manpower or dollars to this particular effort.

15 I think we could have done more
16 with -- this is just my personal leaning now. I
17 think we could have done more with resources to
18 give to students for scholarships, as we have
19 done in the past, and other youth-related
20 activities.

21 Q. Are resources dedicated to scholarships
22 and youth-related activities, are those allocated
23 on an as-needed basis?

24 A. Well, they were part of our
25 programmatic efforts. We felt they were

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1 A. You have to have a -- you have to have
2 a birth certificate to get a driver's license.
3 You have to have a birth certificate to get an
4 EIC. I mean, those are all needed to move
5 forward in the process of getting identification.

6 Q. But in the Texas NAACP's activities
7 related to assisting voters --

8 A. Um-hum.

9 Q. -- to vote --

10 A. Okay.

11 Q. -- have they expended more or less
12 resources for those activities as a result of SB
13 14?

14 A. More.

15 Q. In what way?

16 A. Resources getting people to and from
17 sites, I'm sure were expended by some of our
18 units, where they need to get to DPS offices.
19 We've had Yannis who has been working exclusively
20 on this effort. That has definitely increased
21 our expenditure. Printing of material,
22 informational events to educate the community.
23 What else? Just a number of different
24 activities. Example that comes to mind, I know
25 some of the units who usually just do membership

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1 important parts of it.

2 Q. But those kinds of resources are not
3 included in the set operating funds that you
4 discussed earlier?

5 A. No, they were not a part of those
6 dedicated funds, no. They came out of the
7 operating fund.

8 Q. Okay. So I guess that's a better way
9 to -- I've been calling them operating funds this
10 whole time. There are dedicated funds and then
11 there are operating funds?

12 A. (Witness nodded head.)

13 Q. Dedicated funds are set -- there's a
14 set amount --

15 A. Um-hum.

16 Q. -- that are dedicated for that, and
17 then operating funds, those are the ones that are
18 allocated on an as-needed basis?

19 A. Yeah, discretionary.

20 Q. Okay. So just a recap. Has SB 14 --
21 have the requirements of SB 14 impacted the
22 allocation of dedicated funds?

23 A. No. Not of dedicated.

24 Q. Okay. Outside of legislative
25 activities, outside of registration activities,

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1 outside of voting activities -- I'm sorry,
2 outside of educational activities -- basically
3 outside from what we've already talked about with
4 regard to SB 14, what other kinds of activities
5 has the Texas NAACP engaged in with regard to SB
6 14?

7 A. Okay. Other than the litigation that
8 we're involved in, the education of our
9 community, I can't think of anything else.

10 (Deposition Exhibit Number 3 was
11 marked for identification.)

12 Q. (BY MR. TATUM) Ms. Lydia, I'm handing
13 you what's been marked as Exhibit 3.

14 A. Um-hum.

15 Q. Ms. Lydia, do you recognize this
16 document?

17 A. Yes.

18 Q. Okay. I represent to you that this
19 document has been produced to the defendants in
20 this litigation.

21 A. Um-hum.

22 Q. Is this document representative of an
23 e-mail that you sent to -- or an e-mail exchange
24 between you and a Gillian Parrillo?

25 A. Um-hum.

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1 involved as a presenter. And if you recall, I
2 did say that we did have presenters who came in
3 to discuss.

4 Q. Does Mr. Parrillo work for the TCET?

5 A. I'm really am not sure. I would think
6 he does, based on this e-mail.

7 Q. It mentions further down in the e-mail,
8 he says, "We are planning three more voter ID
9 seminars."

10 A. Um-hum.

11 Q. Are you familiar with those seminars?

12 A. I never attended one of them.

13 Q. Do you recall when they were?

14 A. No, I do not.

15 Q. Do you recall what they involved?

16 A. No, I do not.

17 Q. Were those seminars held by the TCET
18 and not the Texas NAACP?

19 A. I have no idea.

20 Q. Okay. So you don't have any knowledge
21 of what these voter ID seminars he's referring to
22 are?

23 A. No, not at all.

24 Q. And the line below that he mentions
25 virtual phone banks, do you have any knowledge

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1 MS. RUDD: You have to say yes.

2 MR. TATUM: You have to say yes.

3 A. Yes. I'm sorry.

4 Q. (BY MR. TATUM) Thank you.

5 And is that dated October 2nd,
6 2013?

7 A. That's correct.

8 Q. Okay. At the bottom of this page, it
9 says here, from Gillian Parrillo, "I will be
10 sending you hopefully before the end of the week
11 a draft plan of TCET for voter ID work in 2013
12 and 2014." Is that correct?

13 A. Yes.

14 Q. What is TCET?

15 A. I'm not really sure.

16 Q. You don't know what the --

17 A. Oh, it's the organization. The Texas
18 Civic Engagement Table.

19 Q. The Texas Civic Engagement Table?

20 A. Um-hum.

21 Q. Is that an organization that the Texas
22 NAACP regularly interacts with?

23 A. I don't recall having interacted with
24 Mr. Parrillo before. This was in preparation
25 for our state convention and he was probably

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1 about -- of what those are about?

2 A. No.

3 Q. Does the Texas NAACP ever conduct any
4 kind of phone bank activity?

5 A. I think the national has a system that
6 they may utilize.

7 Q. Does the Texas NAACP ever utilize a
8 phone bank?

9 A. I think we are allowed the utilization
10 of the one that national has to send recorded
11 messages to people regarding get out to vote.

12 Q. To your knowledge, has the Texas NAACP
13 ever used that service that the --

14 A. Yes.

15 Q. For what purposes have they used it?

16 A. Probably trying to get people out to
17 vote. Just encouraging people to go out and
18 vote.

19 Q. Have they ever used it to -- for any
20 purpose directly related to SB 14?

21 A. I'm not sure of that. I sort of sensed
22 that's where you were going, but I really don't
23 remember --

24 Q. Okay.

25 A. -- to be honest.

<p style="text-align: right;">98</p> <p>1 Q. At the very bottom of this same page, 2 it says, "Dallas County elections reaching out to 3 voters identified as not having ID." 4 A. Um-hum. 5 Q. Is that a correct reading of that 6 sentence? 7 A. Yes. 8 Q. What is he -- this is still in the 9 e-mail from Mr. Parrillo, what is he referring to 10 there? 11 MS. RUDD: Objection; calls for 12 speculation. 13 A. I have no idea. 14 Q. (BY MR. TATUM) Do you have any 15 knowledge regarding voters identified as having 16 not ID referenced in that statement? 17 A. No, I don't. Sorry. 18 Q. Do you know who was -- who was reaching 19 out to voters identified as not having ID in that 20 statement? 21 A. It says Dallas County elections. I 22 really don't know who at the Dallas County 23 elections would have been doing that. 24 Q. Okay. 25</p>	<p style="text-align: right;">100</p> <p>1 illustrated here? 2 A. Yeah, basically we were trying to find 3 out if there was a standard from county to county 4 as to how they are addressing the voter ID 5 measure. 6 Q. And how did the Texas NAACP go about 7 making that determination? 8 A. Just input from various people from 9 across the state. 10 Q. So this e-mail is seeking input on that 11 issue from those e-mail addresses included in 12 that list? 13 A. Yes, uh-huh. 14 Q. Okay. On the next page there is a 15 paragraph there that starts with, "No one tried 16 to scan my driver's license." Do you see that? 17 A. Um-hum. 18 Q. Did you write that paragraph? 19 A. Yes. Um-hum. 20 Q. Can you tell me a little bit more about 21 the events that are depicted or described in that 22 paragraph? 23 A. Yes. I think if you go back to the 24 first page where it indicates that Phyllis 25 indicated that they attempted to scan her</p>
<p style="text-align: right;">99</p> <p>1 (Deposition Exhibit Number 4 was 2 marked for identification.) 3 Q. (BY MR. TATUM) Ms. Lydia, I'm handing 4 you a document marked as Exhibit 4. 5 A. Okay. 6 Q. Ms. Lydia, I represent to you that this 7 document has been produced to the defendants in 8 this litigation. Do you recognize this document? 9 A. Yes. 10 Q. What is this document? 11 A. This is an e-mail that was sent out to 12 the branch presidents. 13 Q. So everyone in that list is a branch 14 president; is that correct? 15 A. For the most part. There may be some 16 that are not. 17 Q. Okay. But there are branch presidents 18 included in that list of e-mail addresses? 19 A. Yes, sir. 20 Q. Okay. And this was an e-mail sent by 21 you to that group on October 25th, 2013; is that 22 correct? 23 A. That's correct. 24 Q. Okay. Can you briefly describe the 25 contents of this e-mail that you sent, as</p>	<p style="text-align: right;">101</p> <p>1 driver's license and it would not scan, so they 2 used other voter registration card. And my 3 response was, I had a similar incident. My 4 driver's license still does not match exactly the 5 voter registration card because my driver's 6 license did not match my name on the voter roll. 7 I showed my voter registration certificate, okay, 8 which also did not match. And that they did 9 allow me to vote, a regular ballot. 10 Q. So that describes something that 11 happened to you? 12 A. Yes. That happened to me, but let me 13 just make a disclosure. I'm a precinct chair 14 too. They know who I am at the voting location. 15 Q. So let me ask you a little bit about 16 that. You are a voting -- you're a voting 17 precinct chair? 18 A. I'm a precinct chair, yes -- 19 Q. What does the -- 20 A. -- and I'm allowed to vote. 21 Q. Sorry, say that again. 22 A. I'm a precinct chair and I am allowed 23 to vote. 24 Q. I'm not questioning that. 25 A. Okay.</p>

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1 Q. Describe what a precinct chair is.
 2 A. A precinct chair, you have a
 3 geographical area where you try to provide
 4 information to your community about voting.
 5 Obviously the most important piece is mobilizing
 6 people to go out and vote, and I do registration
 7 as well.
 8 Q. So are you a precinct chair for the
 9 Texas NAACP?
 10 A. No. For the county.
 11 Q. For the county? Is that Dallas County?
 12 A. Yes.
 13 Q. Okay. How long have you been a
 14 precinct chair for Dallas County?
 15 A. Probably about ten years.
 16 Q. Are there any other duties that you
 17 didn't describe for a precinct chair?
 18 A. I no long- -- I used to conduct
 19 elections, but I don't do that anymore.
 20 Q. Okay. So a precinct chair -- and I'm
 21 trying to read what's on the live feed again.
 22 It -- you get information out about getting
 23 people to vote and you do -- you said you do
 24 registration as well. What does that mean?
 25 A. I do voter registration.

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1 A. Yes.
 2 Q. And he is the president of the Texas
 3 NAACP; is that correct?
 4 A. That's correct.
 5 Q. Okay. In the paragraph that appears
 6 below the name Yannis, there's a sentence in the
 7 middle of that paragraph that says, "Also,
 8 remember we wanted to take Bob's idea and have
 9 some folks go without an ID and vote with a
 10 provisional ballot and show their driver's
 11 license later and then see if they were counted."
 12 Is that correct? Is that an accurate reading of
 13 that statement?
 14 A. Um-huh. That is.
 15 Q. Who is Bob?
 16 A. Bob Lydia. He's our first vice
 17 president.
 18 Q. Are you related to Bob Lydia?
 19 A. I'm his wife.
 20 Q. And he is the first vice president of
 21 the Texas NAACP?
 22 A. That's correct.
 23 Q. So does that mean he's on the executive
 24 committee?
 25 A. Yes, he is.

103

1 Q. You help people get registered?
 2 A. Um-hum.
 3 Q. Is that -- you actually process the --
 4 A. I will hand out cards to people to fill
 5 out and I also can -- I'm deputized where I can
 6 fill out voter registration cards.
 7 Q. People dictate to you their information
 8 and you fill out their registration cards for
 9 them?
 10 A. Yes, sir.
 11 Q. And you do that for Dallas County?
 12 A. And again, it's volunteer.
 13 Q. Okay.
 14 A. I want to make sure you understand.
 15 Dallas County is not paying me to do that.
 16 Q. That was going to be my next question.
 17 A. No.
 18 Q. Okay. And you've been volunteering in
 19 that capacity for about ten years you said?
 20 A. Yes. Thereabouts.
 21 Q. Further down on this document that I
 22 handed you --
 23 A. Um-hum.
 24 Q. -- it appears to be an e-mail from Gary
 25 Bledsoe; is that correct?

105

1 Q. Okay. Was Bob's idea, that is
 2 summarized here in this sentence, was that idea
 3 put into practice?
 4 A. To my knowledge, it was not.
 5 Q. On the last page there, just one quick
 6 sentence at the top, it says, "Adding Robert to
 7 this e-mail." Is that Robert Knatsen (phonetic),
 8 to your knowledge?
 9 A. You know, that's highly possible, but
 10 I'm not certain.
 11 Q. Okay. You don't know who Robert is
 12 there for certain?
 13 A. I'm not sure who that Robert is --
 14 Q. Okay.
 15 A. -- for certain. I think Yannis wrote
 16 that.
 17 Q. It appears he did.
 18 A. Yeah.
 19 (Deposition Exhibit Number 5 was
 20 marked for identification.)
 21 Q. (BY MR. TATUM) Ms. Lydia, I'm handing
 22 you what's been marked as Exhibit 5. And again,
 23 I represent to you that this document has been
 24 produced to the defendants in this litigation.
 25 Do you recognize this document?

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1 A. Yes, sir.
 2 Q. Okay. Is this an e-mail that you wrote
 3 to the group of e-mail addresses listed there?
 4 A. Yes, sir.
 5 Q. And it was written on January 25th,
 6 2014; is that correct?
 7 A. That's correct.
 8 Q. Okay. And does this e-mail accurately
 9 depict you wrote that day, to the best of your
 10 memory?
 11 A. Yes, sir.
 12 Q. Okay. And does that e-mail group,
 13 similar to the last document I gave you, contain
 14 the names and e-mail addresses of branch --
 15 A. Presidents.
 16 Q. -- presidents? Does it include
 17 political action chairs as well?
 18 A. Yes, it does.
 19 Q. If you could for me turn to the next
 20 page.
 21 A. Um-hum.
 22 Q. Looking at the top of the page at the
 23 paragraph beginning with "During our October
 24 convention."
 25 A. Um-hum.

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1 Q. And do you recall the results of that
 2 test?
 3 A. No, I really don't. And I was just
 4 trying to remember even which cities where I know
 5 it was enacted and it was done, and I don't
 6 recall them.
 7 Q. Do you know if as a result of those
 8 tests anyone was unable to obtain an EIC?
 9 A. Not for sure.
 10 Q. Do you know -- sorry.
 11 A. I'm really not for sure.
 12 Q. Do you know what kind of resources were
 13 expended to conduct those tests?
 14 A. Obviously man-hours. People who had to
 15 disengage from whatever they were doing to go to
 16 the DPS office, and considering the hours they're
 17 operating, they had to take off from work to go
 18 do this, and obviously the resources of driving
 19 there and making certain that they had the proper
 20 documentation to acquire the EIC.
 21 Q. Do you know who conducted these tests?
 22 A. I'm not for sure. I told you, I know
 23 that only a couple of cities actually did it. I
 24 remember there was one particular city who said
 25 they didn't have a DPS office, and, again, I --

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1 Q. Okay. It says there, "During our
 2 October convention, it was decided that our units
 3 would test the process of acquiring election
 4 identification certificates from DPS offices
 5 across the state."
 6 Is that an accurate reading of that
 7 statement?
 8 A. Yes, sir.
 9 Q. And did you write that statement?
 10 A. Yes, I did.
 11 Q. Okay. Were those tests described in
 12 that sentence conducted?
 13 A. To some level they were.
 14 Q. And can you describe the results of
 15 that test?
 16 A. Whoa. I'm not really certain of the
 17 exact, because it was only done maybe in a couple
 18 of the cities, and I don't remember or recall the
 19 exact outcome as to acquiring the EIC.
 20 Q. Did that test involve -- I'm sorry.
 21 I'll retract that question.
 22 So you said this test was conducted
 23 in a couple of cities; is that correct?
 24 A. Yeah, I think it was in a couple of
 25 cities.

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1 and they -- and we didn't want them to have to
 2 expand the funds going into another county that
 3 was really quite distanced from them.
 4 This has been part of our
 5 contention is that these offices are just not
 6 located close to where we live or work and so
 7 it's created a financial hardship.
 8 Q. Do you know who would know the results
 9 of these tests?
 10 A. The individuals who did them --
 11 Q. Do you know --
 12 A. -- obviously.
 13 Q. Do you know who would know who the
 14 individuals that conducted these tests were?
 15 A. I should know, but I can't remember
 16 them. I want to think something -- I want to
 17 think maybe --
 18 Q. Does someone know who these people are
 19 that conducted these tests?
 20 A. I'm sure that someone who were a part
 21 of this committee would know.
 22 Q. But you don't know who that is?
 23 A. No. I'm not sure specifically who on
 24 that committee would know.
 25 Q. Okay. And again just to confirm, these

110

1 tests in some -- to some extent have been
 2 conducted to date?
 3 A. Yes, they have. Um-hum.
 4 Q. But you don't know the result of it?
 5 A. I don't know the outcome of them.
 6 Q. And you don't know who would know the
 7 outcome of them?
 8 A. Not at this time. I could probably
 9 research it for you, but I don't know at this
 10 time.

11 Q. Think about it.
 12 A. Okay. Let me think about it, and if I
 13 come up with the names of the cities -- if I can
 14 come up with the names of the cities, I can
 15 perhaps come up with the name of the person.
 16 Q. You mentioned a conference call --
 17 sorry, back to the document.
 18 A. Um-hum.
 19 Q. You mentioned a conference call to plan
 20 the carrying out of this effort on Monday night
 21 at 9:00 p.m.?
 22 A. Um-hum.
 23 Q. Do you recall if that conference call
 24 took place?
 25 A. Yes, it did.

112

1 on the process involved with getting an EIC from
 2 the Secretary of State's website?
 3 A. Um-hum. Um-hum. Yes.
 4 Q. Did you send any other information
 5 that's not included in this e-mail?
 6 A. I'm trying to think about that for a
 7 second. Is there anything I sent out with them.
 8 There is a possibility that's lingering in the
 9 back of my mind that may be locations of DPS
 10 offices, at some point, may have been provided.
 11 I'm not sure if it was with this or with
 12 something at the state convention.
 13 This was -- this was pursuant to
 14 the state convention. This came about in
 15 January. Our convention was in October, where
 16 this committee, people had agreed to be a part of
 17 this process. So I'm not sure if we gave them
 18 the DPS office locations, printed information,
 19 because not everybody in our association have
 20 access to internet and computers, and, yadda,
 21 yadda, yadda, to get all this information. So we
 22 have to provide a certain amount of printed
 23 material to ensure execution of some of our
 24 efforts.
 25 Q. On the last page of that document --

111

1 Q. Who was on the conference call?
 2 A. I was definitely on the conference
 3 call. Our political action chair would have been
 4 on the call. And our co-chair, I'm sure she was
 5 on it. And various branch presidents. All of
 6 those names above the cc --
 7 Q. Um-hum.
 8 A. -- those are branch presidents, and
 9 then as far as which ones were on it, I really,
 10 really, really can't tell you.
 11 Q. The information that follows your
 12 written paragraph there, titled "How to apply."
 13 A. Um-hum.
 14 Q. There's various information after that.
 15 Some of it's stating, "To qualify for an EIC you
 16 must bring documentation," and kind of describing
 17 that documentation; is that correct?
 18 A. Yes, sir.
 19 Q. Who compiled that information?
 20 A. I copied and pasted it from the
 21 Secretary of State website. It's a copy and
 22 paste straight from them.
 23 Q. So in order to -- again, in relation to
 24 these tests, in order to educate those who would
 25 be carrying out these tests, you sent information

113

1 A. Um-hum.
 2 Q. -- there's an e-mail from Yannis Banks,
 3 it appears; is that correct?
 4 A. Um-hum.
 5 Q. Sent on December 23rd, 2013; is that
 6 correct?
 7 A. Um-hum.
 8 Q. Do you know who he was sending that
 9 e-mail to?
 10 A. I have no idea.
 11 Q. Do you know if he obtained -- from
 12 whoever he was sending this e-mail to, do you
 13 know if he obtained a list of names of people who
 14 had to cast a provisional ballot in the state of
 15 Texas?
 16 A. I have no idea.
 17 (Deposition Exhibit Number 6 was
 18 marked for identification.)
 19 Q. (BY MR. TATUM) I'm handing you what's
 20 been marked as Exhibit 6.
 21 A. Um-hum.
 22 Q. I represent to you that this document
 23 has been presented or produced to the defendants
 24 in this litigation.
 25 Ms. Lydia, do you recognize this

114

1 document?
 2 A. Yes.
 3 Q. What is this document?
 4 A. This is an action alert.
 5 Q. And what is an action alert?
 6 A. These are sent out by our national
 7 office.
 8 Q. So this was compiled and sent out by
 9 the National NAACP office?
 10 A. It probably was sent to either Yannis
 11 or myself, and we, in turn, probably dispersed it
 12 to the units to let them know about it.
 13 Q. Did you disperse it by e-mail or snail
 14 mail?
 15 A. E-mail, faxes, for the most part.
 16 Q. Down in the middle of this page under
 17 the heading, "Now is your time to get involved,"
 18 it states there, "We are calling on local
 19 branches to help our efforts by taking the
 20 following three steps."
 21 Do you see that section?
 22 A. Yes, sir.
 23 Q. Okay. Reading from that, the first
 24 step says, "Visit free or low income health
 25 clinics to see if coordinators are willing to

116

1 Do you know if any VFW hall
 2 referred any persons who had an unexpired photo
 3 ID required to vote?
 4 A. No, sir.
 5 Q. Okay.
 6 A. I do not know that.
 7 (Deposition Exhibit Number 7 was
 8 marked for identification.)
 9 Q. (BY MR. TATUM) I'm handing you what's
 10 been marked as Exhibit 7. This document has been
 11 produced to the defendants in this litigation.
 12 A. (Witness examined exhibit.)
 13 Q. Ms. Lydia, do you recognize this
 14 document?
 15 A. Yes, sir, I do.
 16 Q. And what is this document?
 17 A. These are minutes of the meeting of our
 18 last executive committee meeting, the first
 19 quarter 2014 in Lufkin.
 20 Q. So that was the last quarterly
 21 executive committee meeting held?
 22 A. Yes.
 23 Q. Okay. You mentioned as secretary you
 24 keep minutes of such meetings, correct?
 25 A. Um-hum, um-hum.

115

1 help us with referrals for citizens without IDs."
 2 Is that a correct reading of that
 3 statement?
 4 A. Yes, sir.
 5 Q. Do you know what kind of health clinics
 6 were reached out to?
 7 A. I have no idea.
 8 Q. Do you know if they were reached out
 9 to?
 10 A. No idea, sir.
 11 Q. Okay. Do you know if any referrals
 12 were obtained for citizens without IDs?
 13 A. No, I have no idea either.
 14 Q. Do you know, looking at Point 2, do you
 15 know if any local church services with large
 16 minority congregations were able to provide the
 17 identity of persons without ID?
 18 A. No idea.
 19 Q. Looking at Point 3, what is a VFW hall,
 20 do you know what that is?
 21 A. Veterans of Foreign War.
 22 Q. That statement says, "Go to the VFW
 23 halls in your area and request assistance in
 24 locating people who do not have the unexpired
 25 photo ID required to vote."

117

1 Q. Do these minutes represent what you
 2 took down yourself?
 3 A. Yes, sir.
 4 Q. So you compiled this document?
 5 A. Yes.
 6 Q. Okay. If you would, turn to -- it's
 7 not marked with individual page numbers, but it's
 8 basically the third page of this document.
 9 A. Um-hum.
 10 Q. The bottom quarter of that document
 11 says 6043.
 12 A. Yes.
 13 Q. Okay. Are you on that page?
 14 A. Yes, I am.
 15 Q. Okay. The top of that page, it says,
 16 "Voter ID is the other case scheduled for 9-17 in
 17 Corpus Christi and it will also go to the Fifth
 18 Circuit."
 19 Is that an accurate reading of that
 20 statement?
 21 A. Yes.
 22 Q. Could you read the first bullet point
 23 under that statement, please.
 24 A. "I want to do a sting to see the ease
 25 of getting the free voter ID with our branches."

118

1 Q. What did you mean when you wrote "a
2 sting"?

3 A. Well, a test. The same thing that we
4 had talked about for the conference call.

5 Q. And do you know if a sting to see the
6 ease of getting a free voter ID was conducted?

7 A. I have not received any information
8 that anyone has done that.

9 Q. Okay. When you're referring to a sting
10 in this sentence, is that the same test that was
11 referred to in a previous document I showed to
12 you?

13 A. Exactly. It's a test.

14 Q. Okay. So you're referring to -- here
15 you're referring to getting an EIC?

16 A. EIC, yes.

17 Q. Okay. Could you read the third bullet
18 point there, please.

19 A. "Need examples of folks who were
20 denied."

21 Q. Do you know if any of such examples
22 were found or provided?

23 A. I have no idea.

24 Q. Okay. Is that also in reference to the
25 EIC test?

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1 Protection. I'm familiar with it. I really do
2 see a lot of documents. I don't have any direct
3 recall of it, but it looks like something I
4 probably would have seen.

5 Q. Okay. Was this document, to your
6 knowledge, compiled by the NAACP, the Texas
7 NAACP?

8 A. No, I don't think so.

9 Q. Is this the kind of document that the
10 Texas NAACP would distribute to its members?

11 A. It's informational. I mean, obviously
12 this sort of clarifies to individuals what would
13 be needed to vote. I mean, I wouldn't see
14 anything objectionable as long as it's
15 nonpartisan and it's not advocating for one party
16 over another, yeah, I would say we would do that.

17 We would hand out something like
18 this. It would not be -- it would not be
19 something that would be opposed to our
20 constitution and bylaws.

21 Q. So you mentioned it would be handed
22 out. Is that the only way that something like
23 this would be distributed?

24 A. Handed out, e-mailed, I would think.

25 Q. Okay.

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1 A. Yes, sir.

2 Q. Okay. The very next line down mentions
3 a name TaNeika; is that correct?

4 A. That's correct.

5 Q. Who is that?

6 A. She's the president of one of our
7 units.

8 Q. One of the local branches?

9 A. One of our branches of the state.

10 Q. Right. She's the president of one of
11 the local NAACP branches in Texas?

12 A. Yes, uh-huh.

13 Q. Do you know which branch?

14 A. Killeen, Texas, I'm pretty certain.
(Deposition Exhibit Number 8 was
16 marked for identification.)

17 Q. (BY MR. TATUM) Handing you a copy of
18 what's been marked as Exhibit 8. This has also
19 been produced to the defendants in this
20 litigation.

21 Ms. Lydia, do you recognize this
22 document?

23 A. (Witness examined exhibit.)

24 Hmmm. I'm going to have to say I
25 don't recognize it, but I know Election

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1 A. And, yes, I think I have seen this
2 document before, and actually I think I saw it at
3 somebody else's event at a church, I think is
4 where I saw it.

5 Q. That document was not created by the
6 Texas NAACP?

7 A. Oh, no. We did not create that.

8 Q. Okay. Does the Texas NAACP regularly
9 distribute materials that it did not itself
10 create?

11 A. On occasion, and occasionally we will
12 coalesce. Like the Texas Criminal Justice
13 coalition where we had the re-enfranchisement
14 effort, we coalesced with them to create a
15 document, that way we can -- our resources can go
16 further.

17 Q. So do you often seek assistance from
18 other organizations to accomplish tasks such as
19 print-outs, fliers, handouts, that kind of thing?

20 A. On occasions.

21 Q. Okay. And in return, do you provide
22 similar services to other organizations if they
23 ask for it?

24 A. Again, they have to fall within the
25 purview of our national guidelines --

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1 Q. Of course.
 2 A. -- of coalescing, because we have to
 3 have approval to coalesce in groups.
 4 (Deposition Exhibit Number 9 was
 5 marked for identification.)
 6 Q. (BY MR. TATUM) I'm handing you what's
 7 been identified as Exhibit 9.
 8 MR. TATUM: And I only brought one
 9 copy of that.
 10 MS. RUDD: That's fine. I'll just
 11 share.
 12 THE WITNESS: Oh, okay.
 13 MR. TATUM: I didn't even bring one
 14 for myself.
 15 Q. (BY MR. TATUM) Ms. Lydia, that
 16 document has been produced to defendants in this
 17 litigation. Do you recognize that document?
 18 A. Yes.
 19 Q. What is it?
 20 A. It's basically part of the study for
 21 the EIC.
 22 Q. Okay. So the study -- the test that
 23 you referred to previously --
 24 A. Um-hum.
 25 Q. -- that is a -- how does that relate to

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1 break or are we continuing on?
 2 MR. TATUM: Oh. No, sorry, Angela,
 3 we're continuing on.
 4 MS. MILLER: Okay. Sounds good.
 5 MR. TATUM: Okay.
 6 Q. (BY MR. TATUM) Ms. Lydia, to the best
 7 of your knowledge, have any Texas NAACP ever
 8 expressed concerns to you or to the executive
 9 committee regarding election crimes, voter fraud
 10 or voter impersonation?
 11 A. No.
 12 Q. Has the Texas NAACP ever conducted any
 13 studies or collected data from its members or
 14 from any other sources relating to election
 15 crimes, voter fraud or voter impersonation?
 16 A. No, not to my knowledge.
 17 Q. Are there plans to conduct any such
 18 studies?
 19 A. Not to my knowledge.
 20 Q. Okay. If there were plans to conduct
 21 such studies, would you know about it?
 22 A. It would have to be voted on upon by
 23 the executive committee.
 24 Q. On that note, do actions of the Texas
 25 NAACP that must be voted on by the executive

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1 the test?
 2 A. Well, it basically is used to collect
 3 the data that they would have obtained as a
 4 result of going to a DPS office to try to obtain
 5 an EIC.
 6 Q. And once filled out, who would those
 7 forms have been submitted to?
 8 A. Once filled out, they should have been
 9 submitted either to Yannis or myself.
 10 Q. Do you recall ever seeing a filled-out
 11 version of that?
 12 A. No, I've never gotten one.
 13 Q. Okay. I have no more documents to give
 14 you right now.
 15 A. Okay.
 16 Q. That's the last of that string.
 17 MR. TATUM: Is everyone doing all
 18 right? Do we need to take a break for any
 19 reason?
 20 MS. MILLER: Whenever you guys
 21 want.
 22 MS. RUDD: I'm fine. Are you okay?
 23 THE WITNESS: Yeah.
 24 MR. TATUM: Okay.
 25 MS. MILLER: Are we going to take a

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1 committee, do those votes only occur at the
 2 quarterly meetings?
 3 A. No.
 4 Q. Can they occur on a moment's notice or
 5 outside of those quarterly meetings?
 6 A. Yes, they can.
 7 Q. Okay.
 8 A. Definitely.
 9 MR. TATUM: Actually, I think this
 10 is a pretty good place to take a break, if that's
 11 all right. It's 11:40. We're kind of
 12 approaching the lunch hour.
 13 Can we go off record to discuss
 14 real quick.
 15 MS. RUDD: Sure.
 16 (Discussion off the record.)
 17 (Lunch recess.)
 18
 19
 20 REPORTER'S NOTE: Please be advised
 21 that an UNCERTIFIED ROUGH DRAFT version of this
 22 transcript exists. If you are in possession of
 23 said rough draft, please replace it immediately
 24 with this CERTIFIED FINAL TRANSCRIPT.
 25

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1 AFTERNOON SESSION
 2 MR. TATUM: We're back on the
 3 record.
 4 EXAMINATION (CONTINUED)
 5 BY MR. TATUM:
 6 Q. Ms. Lydia, before we took a break, we
 7 were talking about activities of the Texas NAACP
 8 related to SB 14. You had previously talked
 9 about -- we covered education. We covered
 10 registration. We covered legislation, and then
 11 right before the break, you were talking about
 12 testing the process by which an EIC is obtained,
 13 correct?
 14 A. Yes.
 15 Q. Are there any other activities related
 16 to SB 14 that the Texas NAACP has committed
 17 resources to that you did not already mention?
 18 A. I think I have mentioned a few
 19 occasions the reallocations of staff to the
 20 efforts related to the litigation itself --
 21 excuse me -- as well as the focus, the main focus
 22 of the activities that are being conducted by our
 23 state conference.
 24 Q. So would you call --
 25 A. Excuse me.

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1 A. I think that some of our units
 2 definitely would have done that and would have
 3 assisted them the best they could. If it was
 4 something that could be -- if there was -- if it
 5 was a process that was -- or a procedure that was
 6 needed, I know that some of our units would have
 7 probably assisted them in getting that worked
 8 out, whether it was telling them how to go about
 9 getting -- and now some of them are
 10 insurmountable, you know, where people who were
 11 delivered by midwives and perhaps do not have a
 12 birth certificate.
 13 And then others, obviously you can
 14 assist them by telling them where they need to go
 15 to get a birth certificate in order to complete
 16 the process of getting identification.
 17 Q. Does the Texas NAACP claim that it has
 18 members or constituents who are registered to
 19 vote but do not possess any of the acceptable
 20 forms of ID under SB 14?
 21 A. I'm not really sure of that. Let me
 22 just say I don't have personal knowledge of that.
 23 Q. You don't have personal knowledge of
 24 whether there are any members of the Texas NAACP
 25 who do not have an acceptable form of ID under

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1 Q. Sorry. When you say "the main focus of
 2 the activities," what is the -- what is the main
 3 focus of the activities, if you haven't already
 4 described it?
 5 A. The litigation and preparing for this
 6 litigation to try to reverse what has happened
 7 because of the perceived impact on the voting
 8 process within our state.
 9 Q. Are there any other kind of field tests
 10 or stings that the Texas NAACP has conducted
 11 related to SB 14?
 12 A. I think most of the other activities
 13 would have been -- would be surrounding educating
 14 our communities and that's an ongoing process.
 15 As I said earlier, I don't think we
 16 have been successful in getting this message to
 17 as many people as we need to, but we have started
 18 making inroads through our units to our distant
 19 communities regarding the necessities that are
 20 being required for people to vote.
 21 Q. Has the Texas NAACP itself been
 22 actively seeking to identify either its own
 23 members or registered voters in Texas that do not
 24 have an acceptable form of ID to vote under
 25 SB 14?

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1 SB 14?
 2 A. When you consider the size of our
 3 organization and the number of people we have, I
 4 would be -- I think I would be really careless to
 5 say that nobody has been impacted by the need for
 6 this ID. I think the odds are just absolutely in
 7 favor of perhaps that having been the case, that
 8 they have been negatively impacted.
 9 MS. RUDD: And maybe this is a good
 10 place, Stephen, for me to interject that we're
 11 not presently aware of any particular -- the
 12 identity of any particular member who has been or
 13 will be injured by Senate Bill 14 for the
 14 purposes of proving standing in this case. But
 15 we will supplement that response if and when we
 16 identify such a member.
 17 So I think that's consistent with
 18 what we agreed to, and it's consistent with what
 19 Mr. Banks testified to in terms of not having yet
 20 identified any particular member who suffered
 21 injury as a result of Senate Bill 14.
 22 MR. TATUM: Okay. So just to
 23 confirm . . .
 24 MS. RUDD: So I think when we're
 25 talking about that agreement --

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1 MR. TATUM: Yes.
 2 MS. RUDD: -- we're falling under
 3 Number 2, Stephen.
 4 MR. TATUM: Okay. And, Angela,
 5 we're talking about the e-mail chain between Ezra
 6 and Lindsey Wolf.
 7 MS. MILLER: Okay.
 8 MR. TATUM: The agreement that's
 9 encompassed in that e-mail chain.
 10 MS. MILLER: Okay.
 11 MR. TATUM: Right now we're under
 12 Number 2; that Texas NAACP is either unaware of
 13 the identity of any particular member who has
 14 been or may be injured by the implementation of
 15 SB 14 or that it does not maintain sufficient
 16 information to identify a particular member who
 17 has been or may be injured by implementation of
 18 SB 14.
 19 MS. RUDD: Correct. And the only
 20 caveat to that, I will add, is that it's a
 21 present awareness. So there may be a time where
 22 we do become aware of a particular member's
 23 identity, at which point we will give you that
 24 information, as well, subject to the highly
 25 confidential designation.

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1 A. Not really, no. There's no cost. It's
 2 free.
 3 Q. Are there any nonmonetary costs to
 4 getting an EIC -- sorry. Are there any
 5 nonmonetary costs to getting a voter registration
 6 card?
 7 A. The accessibility of voter registration
 8 cards at every post office, library, church in
 9 our community, makes it, as far as I am
 10 concerned, a nonmonetary event.
 11 Q. So do you believe that there is no
 12 associated costs, monetary or otherwise, with
 13 getting a voter registration card?
 14 A. No. There's not even postage required
 15 to send the card in. There's -- there's no cost.
 16 You fill it out and send it.
 17 Q. Does that require time to fill out a
 18 voter registration card?
 19 A. Well, yes, of course.
 20 Q. Do you consider the expense of time as
 21 a cost with getting a voter registration card or
 22 an EIC?
 23 A. Yeah, there is an expense of time. If
 24 that's what you want me to say. Yes, there is.
 25 Q. I don't want you to say anything. I

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1 MR. TATUM: Okay. Thank you for
 2 interjecting that.
 3 If you would, give me a moment
 4 to --
 5 THE WITNESS: No problem.
 6 Q. (BY MR. TATUM) Ms. Lydia, does the
 7 Texas NAACP -- are you ready?
 8 A. Yes.
 9 Q. Does the Texas NAACP contend that there
 10 are associated costs with getting an EIC?
 11 A. Yes.
 12 Q. And what are those associated costs?
 13 A. Getting to a DPS office. That would be
 14 the first. The hours of operation of the DPS
 15 office would necessitate someone having to take
 16 off of work in order to get there.
 17 Birth certificates, if you do not
 18 have a copy of one, you have to order those
 19 through the Bureau of Vital Statistics. There's
 20 a cost associated with that. Those are all, I
 21 think, real causes -- costs, rather, associated
 22 with getting an EIC.
 23 Q. Does the Texas NAACP believe that there
 24 are associated costs with getting a voter
 25 registration card?

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1 want you to give an honest answer.
 2 A. Well, obviously the card has to be
 3 filled out by someone in order for it to be
 4 processed by the election department within the
 5 respective county.
 6 So there is some time, but the time
 7 involved in that is so minimal. We're talking
 8 name, address, date of birth, the last four of a
 9 social or a driver's license, and you sign it.
 10 It does not require production of a -- any type
 11 of documentation to prove who you are.
 12 Q. Ms. Lydia, why does the Texas NAACP
 13 feel it necessary to devote time and resources
 14 towards voter registration activities?
 15 A. Because it -- because this is a right
 16 of citizenship in this country, the right to
 17 vote. And especially it has been hard fought by
 18 African-Americans. The time was we had poll
 19 taxes as a form of disenfranchising. "How many
 20 bubbles in a bar of soap" kind of lunacy testing.
 21 So, yeah, there is a long and
 22 egregious history of African-Americans and other
 23 minorities being disenfranchised in this country.
 24 And maybe I'm a little bit outraged
 25 that I even have to answer that question because

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1 it's so blatantly obviously.

2 Q. Ms. Lydia, to be clear, I am not
3 questioning whether someone should have the right
4 to register to vote.

5 A. Okay. Understood.

6 Q. Okay. I don't want to come across
7 as --

8 A. I gotcha.

9 Q. -- as questioning that right.

10 A. Okay. Thank you.

11 Q. What I'm wondering is if there are so
12 minimal costs to getting a voter registration
13 card --

14 A. Um-hum.

15 Q. -- why does the Texas NAACP devote so
16 many resources towards helping people get
17 registered?

18 A. Because it's part of our mission.

19 Q. And is it still able to fulfill that
20 part of its mission since the enactment of SB 14?

21 A. Yes, with added -- with an added
22 burden.

23 Q. And with regard to getting a voter
24 registration card, what is that added burden?

25 A. We have to educate them about what they

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1 SB 14?

2 A. Yes.

3 Q. And what is the basis for that claim?

4 A. I think the socioeconomic factors that
5 are present in our community would lend to that.

6 Q. Could you describe some of those
7 socioeconomic factors.

8 A. Not everybody in our community. I
9 think we have a disproportionately lower number
10 of individuals with automobiles, which in Texas
11 is a necessity. If you lived in, say,
12 San Francisco where the BART can take you
13 anywhere and everywhere you want to go with ease
14 and affordability, I would say maybe not as much.
15 But in Texas, a car is essential because our mass
16 transportation system is not adequate.

17 And so as a result, if you don't
18 have a car, there's no way you could really get
19 to a DPS office unless you catch the bus, and
20 then you're talking about two or three buses to
21 get there because, again, the DPS offices are not
22 located in our neighborhoods. The hours of
23 operation would require us to take off work in
24 order to go and apply for an EIC or any form of
25 identification that you would acquire through

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1 have to do in order to utilize that voter
2 registration card.

3 Q. Okay.

4 A. If you don't have the documentation or
5 the ID to go with that voter registration card,
6 it's a worthless piece of paper.

7 Q. Does the Texas NAACP contend that SB 14
8 amounts to a poll tax?

9 A. I don't know if the Texas State NAACP
10 does, but I do.

11 Q. And why do you believe that?

12 A. Because it's another obstacle to
13 someone going to vote. Anything that presents an
14 obstacle or an encumbrance to people exercising
15 their rights, you know, that was guaranteed under
16 the 14th, I think it -- I see it as being a
17 burden.

18 Q. Ms. Lydia, to the best of your
19 knowledge, is SB 14 the first law that has -- or
20 the first bill that has changed the law with
21 regard to voting requirements in Texas?

22 A. To my knowledge, it is.

23 Q. Does the Texas NAACP contend that
24 minority citizens are less likely than white
25 citizens to have an acceptable form of ID under

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1 DPS. It's a burden and it's impacting us because
2 we don't have transportation, one.

3 We don't have the financial
4 resources. Our unemployment is in double digits
5 whereas the rest of the country is in single
6 digits. It's gone down some, yes. But there
7 still is, you know, a disparity there, and so we
8 don't have the financial resources to catch the
9 bus as often or acquire other forms of
10 transportation to get to these places to acquire
11 identification.

12 Those, I think, are probably the
13 most compelling reasons.

14 Q. And are those reasons that you just
15 summarized, are those based on any specific data
16 or studies or anything like that?

17 A. I think the statistics are stated in
18 the complaint.

19 Q. You'd defer to the statistics in the
20 complaint?

21 A. Um-hum.

22 Q. Okay. Does the Texas NAACP contend
23 that minority citizens are less likely to be able
24 to obtain an acceptable form of ID than white
25 citizens?

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1 A. Yes.
 2 Q. And what is the basis for that claim?
 3 A. The socioeconomic reasons that I just
 4 stated to you.
 5 Q. So you would refer to the answer to the
 6 previous question?
 7 A. Yes, sir.
 8 Q. Are you familiar with the provisional
 9 ballot?
 10 A. Oh, yeah.
 11 Q. Okay. Is it correct to say that SB 14
 12 provides that a provisional ballot will only be
 13 counted if a voter subsequently presents one of
 14 these six forms of acceptable ID required by SB
 15 14 to the registrar within six days after the
 16 election?
 17 A. Um-hum. Yes, that's there.
 18 Q. Is what I just said a correct --
 19 A. Yes, that is built into SB 14. Sorry.
 20 Q. Does the Texas NAACP contend that the
 21 six-day allowance imposes a burden?
 22 A. Yes.
 23 Q. Why?
 24 A. Because instead of it being resolved at
 25 the -- at the election site, you are required to

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1 Q. So it's more of a burden to have to
 2 travel to the registrar to confirm a provisional
 3 ballot?
 4 A. Exactly what I'm saying.
 5 Q. Does the fact that you're only allowed
 6 six days to do that, does that impose a burden,
 7 the time limit allowed?
 8 A. I'm not seeing the days as necessarily
 9 a burden. I think just the fact that you do have
 10 to prove that you are who you say you are,
 11 through one of those six forms of ID, by going to
 12 an election department, a county election
 13 department, that is the burden within itself.
 14 Q. Where are election places normally?
 15 When we talk about polling places --
 16 A. Okay.
 17 Q. -- where are those -- can you give me
 18 an example of where those are held?
 19 A. For the purpose of early voting or just
 20 a regular election?
 21 Q. Either.
 22 A. During early voting, that's why we have
 23 always encountered our people to do early voting.
 24 They can go any place and vote within their
 25 county.

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1 show up at a county election department to
 2 provide that information. The resolution to the
 3 problem cannot occur anywhere but at the election
 4 department after that election has been
 5 completed.
 6 So, once again, we're talking about
 7 resources diverted to go to the election
 8 department, which again, is not in our
 9 neighborhood, and you have to have transportation
 10 to get there and their hours are even less than
 11 the Department of Public Safety. Theirs are 8:00
 12 to 5:00.
 13 Q. Is it your position that it wouldn't be
 14 a burden if you had to return to the polling
 15 place?
 16 A. I think it would be less of a burden if
 17 you could do it that same day and do the
 18 resolution.
 19 Q. It would be less of a burden?
 20 A. Yeah, less of a burden.
 21 Q. Do you still have to travel to the
 22 polling place?
 23 A. Well, the polling places are usually in
 24 our neighborhoods because we're divided into
 25 precincts.

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1 Q. Um-hum.
 2 A. So that makes it a lot easier for
 3 people to actually show up and vote.
 4 During the regularly scheduled
 5 election, you have to go to an assigned precinct,
 6 and if you move or if they decide to change the
 7 location of the voting precinct -- but it's
 8 always in closer proximity to where the person
 9 lives.
 10 Q. So I guess what I'm kind of getting at,
 11 are they held in elementary schools sometimes?
 12 A. Usually.
 13 Q. Or local public libraries?
 14 A. Um-hum. Yes.
 15 Q. Are they generally held in places that
 16 are open to the public?
 17 A. Yes.
 18 Q. Is it the Texas NAACP's position that
 19 it would be less of a burden if you were able to
 20 prove a provisional ballot by going back to an
 21 election polling place than it is to go to the
 22 registrar?
 23 A. I would say definitely.
 24 Q. So would the Texas NAACP prefer that a
 25 polling place be kept open at one of these public

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1 places in order to confirm provisional ballots?
 2 A. I can't speak for the entire
 3 association or our state conference.
 4 Q. But you have been designated to testify
 5 here on its behalf; is that correct?
 6 A. Yeah, but when I make the comment about
 7 the distance, the distance to your polling place
 8 is definitely going to be closer, in most
 9 instances, I would say 90 percent, is going to be
 10 closer than your election department.
 11 So by virtue of that, it creates a
 12 greater hardship than if you were going back to
 13 the voting location where the issue arose.
 14 Q. Would it be less of a burden if voters
 15 were given 12 days to confirm a provisional
 16 ballot as opposed to six?
 17 A. I don't think that's going to make a
 18 lot of difference one way or the other. You
 19 still have the expense incurred with getting to
 20 the location and the expense incurred taking off
 21 work to get there.
 22 Q. Does the Texas NAACP support the idea
 23 of a provisional ballot?
 24 A. With the absence of anything else, I've
 25 never heard an official position.

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1 understanding of the purpose of a provisional
 2 ballot?
 3 A. To allow someone to exercise their
 4 right to vote, and this is sort of like the last
 5 stop along that way, if the person cannot provide
 6 adequate identification or whatever is needed to
 7 vote, then they are allowed to cast this ballot
 8 and the ballot is separated, segregated from all
 9 of other ballots that are going to be counted.
 10 And they're contained separately in a box, and
 11 then they're taken down to the county election
 12 department, and as you stated, they have a
 13 certain number of days to go there and provide
 14 additional proof that they, in fact, were
 15 authorized to vote.
 16 Q. Have you ever had to cast a provisional
 17 ballot?
 18 A. Never.
 19 Q. Does the Texas NAACP claim that
 20 minority citizens are less likely to be
 21 appropriately educated about the change in
 22 requirements for voting?
 23 A. I would have to say yes.
 24 Q. And what is that claim based on?
 25 A. It's based on the fact that our people

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1 Q. Do you think provisional ballots are
 2 important?
 3 A. As a precinct chair, I would say yes.
 4 But I also, as a precinct chair, know that most
 5 of the times those ballots are never counted.
 6 Q. Provisional ballots are never counted?
 7 A. Very seldom.
 8 Q. Why is that?
 9 A. Because people do not come back or go
 10 back into an election department and the
 11 elections have already been decided by the time
 12 they go back. That's another thing. Those
 13 elections are decided the same evening, if not
 14 early the next morning, so six days or 12 days
 15 really isn't going to make a whole lot of
 16 difference if you do show up.
 17 Q. You don't think that provisional
 18 ballots make a difference?
 19 A. I don't think they've made any
 20 differences in my history with voting. I've
 21 never known provisional ballots that have
 22 impacted the outcome of an election. Now, that's
 23 not to say it hasn't happened somewhere else, but
 24 it's not -- it's not part of what I know.
 25 Q. Just to confirm, what is your

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1 do not have the same level of computer literacy
 2 as the rest of the population, whether that's
 3 because of socioeconomic factors, they can't
 4 afford a computer or cannot afford the internet
 5 services that are needed to operate and acquire
 6 this information.
 7 I still send faxes to people,
 8 branch presidents who do not have or cannot
 9 operate, because of age. And a lot of older
 10 people have mastered, you know, the computer
 11 system, but then we do have some older ones who
 12 just have not given into that, for whatever
 13 reason.
 14 Q. Do you think education about voter
 15 requirements can only be accomplished through the
 16 use of a computer?
 17 A. No. No.
 18 Q. What other ways might someone be
 19 educated about voter requirements?
 20 A. We -- that's why I told you that the
 21 recruiting efforts by our branches, which always
 22 have membership recruiting, that is, have always
 23 included voter registration card because that's
 24 part of our mission.
 25 Now, we also do the education piece

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1 about voter ID. That is a necessity because we
 2 are trying to reach out to people in our
 3 community, whether it's through the churches or
 4 whether other events that are going on in the
 5 community, concerts, wherever we can reach the
 6 masses, we go.
 7 Q. Does the Texas NAACP contend that
 8 minority citizens are more likely to fall victim
 9 to the discretionary application of voter ID
 10 laws?
 11 A. I would think so.
 12 Q. And what is that claim based on?
 13 A. The fact -- the e-mail that you brought
 14 up earlier. The issue with Phyllis that was
 15 stated about the requirements about the driver's
 16 license scanning. Now, there's no question
 17 Phyllis wouldn't have been disenfranchised
 18 because Phyllis is not a person who had been put
 19 off, as Exhibit 4 -- it says, "Phyllis indicated
 20 they attempted to scan her driver's license and
 21 it would not scan, so they used her voter
 22 registration card as proof of who she was."
 23 So, you know, it's -- a lot of
 24 people have had that issue, and there was
 25 different activities -- that's the thing, when

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1 "Early voting started on Monday and
 2 President Bledsoe was trying to see if there was
 3 a standard of ID in voters. Phyllis indicated
 4 they attempted to scan her driver's license and
 5 it would not scan, so they used her voter
 6 registration card."
 7 Q. Yes.
 8 A. And then she also talked about early
 9 voting. So there -- I mean, there have been
 10 various and sundry rules that have been
 11 imposed -- and, again, it's discretionary by the
 12 election judge as to whether or not that person's
 13 identification is adequate or not.
 14 Q. I understand that point you're making.
 15 You've referred to this e-mail recounting
 16 Phyllis's story --
 17 A. Um-hum.
 18 Q. -- as evidence of such discretionary
 19 application of those laws.
 20 A. Um-hum.
 21 Q. Could you point to me exactly which
 22 part of this story that happened to Phyllis
 23 involves discretionary application of laws.
 24 A. What happened to her, and look at what
 25 happened to me. Two different voting locations.

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1 you allow human discretion, some precinct
 2 election officials, you know, they'll say, okay,
 3 this is close enough. And then there are others
 4 who will say, no, you know, we need exact, so
 5 you're going to have to sign off on this or
 6 you're going to have to vote a provisional
 7 ballot. It's totally discretionary with an
 8 election judge.
 9 So, yes, that is one of our
 10 contentions for sure.
 11 Q. I want to go back to that e-mail about
 12 Phyllis.
 13 A. Um-hum.
 14 Q. I'm sorry, I'm trying to locate it.
 15 A. It's Exhibit 4.
 16 Q. Okay. Are you referring to page 2 of
 17 Exhibit 4, the paragraph -- I'll let you get
 18 there.
 19 A. (Witness complied.)
 20 Q. Could you point to a specific -- I'm
 21 looking at page 2, the paragraph beginning, "No
 22 one tried to scan my driver's license."
 23 A. Go back to page 1 of Exhibit 4. Under
 24 the list of the recipients for that e-mail, it
 25 says, "early voting."

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1 One voting location was scanning driver's
 2 license, and when they couldn't -- if she hadn't
 3 had her voter registration card, she may not have
 4 been able to vote, but she happened to carry it.
 5 And then you look at what happened
 6 when I went to vote and my ID did not match what
 7 was on the voter's roll. My driver's license
 8 does not match what they have on their voter's
 9 roll.
 10 Q. At what point was there a discretionary
 11 application of the law made in those two stories?
 12 A. Well, they made a decision that they
 13 would accept only -- if she didn't have the
 14 driver's license -- I mean, the driver's license
 15 would not scan, which they wanted a copy of.
 16 They made a decision that, okay, we
 17 need that information in order for you to vote,
 18 obviously, so we can use your voter registration
 19 card. What if she had not had her voter
 20 registration card and the driver's license did
 21 not scan. Someone could have exercised the, you
 22 know, decision not to have allowed her to vote.
 23 Q. Are you required to have a voter
 24 registration card to vote?
 25 A. Not -- I don't think you do anymore. I

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1 think all you need is an ID and it has to match
 2 what's on the voter's roll.
 3 Q. So in both of these stories, both the
 4 story that happened to you and Phyllis, y'all
 5 were both able to vote, correct?
 6 A. Yeah. We were definitely both able to
 7 vote.
 8 Q. Okay. So were y'all harmed in any way
 9 in these two specific instances?
 10 A. No. But that is an example of
 11 discretion by the people who are conducting the
 12 election, as to what they want and what they do
 13 not want.
 14 Q. In these two stories, if the machine
 15 were able to scan the driver's license, would
 16 there have been -- what would have happened then?
 17 A. I'm sure everything would have been
 18 fine, I mean, because that was what the necessity
 19 was or that particular election judge to allow
 20 her to vote.
 21 Q. So the problem occurred when the
 22 machine couldn't scan the driver's license?
 23 A. Apparently.
 24 Q. Okay. So after that happened, at what
 25 point did the election official use his or her

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1 Q. A prerequisite to voting.
 2 A. Well, you have to have a voter
 3 identification to vote. Is that what you're
 4 referencing?
 5 Q. I'm refer -- I'm referencing the
 6 requirements of SB 14.
 7 A. You have to have voter identification
 8 to vote, which is mandated in SB 14.
 9 Q. And does the Texas NAACP contend that
 10 that mandate denies or abridges the right to vote
 11 on the account of race or membership in a
 12 language minority group?
 13 A. I think it definitely presents
 14 impediments.
 15 Q. And what is the basis for that claim?
 16 A. The costs associated with acquiring the
 17 needed identification to vote. You don't even
 18 need a voter's certifi- -- voter registration
 19 card to go vote. You have one of those six forms
 20 of identification that must match something
 21 that's written on the voter's roll.
 22 Q. Is the claim that SB 14 will deny or
 23 abridge the right to vote on account of race or
 24 membership in a language minority group based
 25 on -- is that claim based on any kind of study

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1 own discretion to apply a voter law?
 2 A. Mr. Tatum, I can't tell you exactly at
 3 what point they made the decision that she had a
 4 voter registration card that would allow her to
 5 vote. I really don't know that. I wasn't there.
 6 Q. Okay.
 7 A. Okay? I'm only relaying what she told
 8 us.
 9 Q. Do you know what discretionary law was
 10 being applied in that instance?
 11 A. I'm not sure.
 12 Q. Okay.
 13 A. If there was a law other than this, it
 14 was a decision made by the election judge.
 15 Q. So in that case, the ultimate decision
 16 that was made by the election judge was to allow
 17 both you and Phyllis to vote?
 18 A. Not the same election judge now. Two
 19 different election judges.
 20 Q. Right. The respective election judges.
 21 A. Yes. Um-hum.
 22 Q. Does the Texas NAACP contend that the
 23 requirements of SB 14 constitute a prerequisite
 24 to voting?
 25 A. Constitute . . .

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1 conducted by the NAACP or anyone else?
 2 A. I'm not sure of that.
 3 Q. Is that based on conversations that
 4 members of the Texas NAACP executive committee
 5 have had with members of the Texas NAACP?
 6 A. I would say that that would be true.
 7 Q. Does the Texas NAACP contend that SB 14
 8 makes it impossible for anyone to vote?
 9 A. No. I wouldn't say impossible. That's
 10 really extreme. No.
 11 Q. Does the Texas NAACP contend that SB 14
 12 forces eligible voters to choose between voting
 13 and other uses of their limited time and
 14 resources?
 15 A. Definitely. Yes.
 16 Q. How does SB 14 force an eligible voter
 17 to choose between voting and using their other
 18 time?
 19 A. Time that they expend going to or from
 20 a DPS office, waiting two to three hours to
 21 receive service. Sometimes even after being
 22 there two or three hours, not receiving services
 23 because they lacked a document that's needed; if
 24 they're not adequately informed about the
 25 expectations and requirements.

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1 That's why we have worked really
2 diligently to try to make -- ensure that when
3 people do show up, take off from work, expend the
4 financial resources to get to a location, that
5 they are adequately prepared for obtaining the
6 document that they need to vote.

7 Q. Before SB 14, did a voter have to
8 choose between voting and doing something else?

9 A. Not really, because the voting
10 locations are open after traditional work hours.
11 So they could vote after work. The polls usually
12 open before they go to work. And early voting,
13 you can vote on Saturday and Sunday. You cannot
14 go to DPS on Saturday and Sunday and get these
15 documents that we need to vote.

16 Q. Would you agree that everyone must make
17 a conscious choice to vote at some point?

18 A. Yeah. I think you're right about that.
19 Yes.

20 Q. Do you think that choice must be made,
21 irrespective of the laws there in place at that
22 time?

23 A. When you have -- God, I wish I could
24 remember the statement. When you have laws that
25 unnecessarily burden the people, poll taxes, "how

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1 And I'm sorry, I really thought you
2 knew what I was talking about when I was saying
3 "bubbles in a bar of soap."

4 Q. That's okay.

5 Are you aware of any members of the
6 Texas NAACP that are registered to vote but have
7 chosen not to vote as a result of SB 14?

8 A. No.

9 Q. Do you know anyone who is registered to
10 vote but has made the conscious choice to not
11 vote because of SB 14?

12 A. Sort of as a protest perhaps? No, I've
13 never even heard of that concept of someone not
14 voting because of SB 14. I mean, that's so
15 alien. No. I've never even thought about it.

16 Q. Does the Texas NAACP not contend that
17 SB 14 forces people to choose between voting and
18 not voting?

19 A. I think circumstances.

20 Q. What do you mean by that?

21 A. Circumstances would cause people to not
22 have gone, perhaps, and gotten the necessary
23 documents that they need to vote. So I think
24 there are people who probably -- I don't know
25 them personally, and I want to make sure you

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1 many bubbles are in a bar of soap," those kinds
2 of laws.

3 Q. Could you explain a "how many bubbles
4 are in a bar of soap" type of law?

5 A. Yeah. It was a way of assessing
6 whether or not you had the capacity to vote.

7 Q. I'd never heard that expression.

8 A. You've never heard that before?

9 Q. No, I have not.

10 A. You're younger than I am, a lot
11 younger.

12 There was actually a test that used
13 to be administered to African-Americans, and one
14 of the common -- I mean, across the country --
15 especially in the south, one of the questions
16 that was asked of individuals in order for them
17 to get a voter registration card was, "How many
18 bubbles are in a bar of soap?"

19 And you look like you're a very
20 well-educated man. Why don't you tell me how
21 many bubbles you think were in a bar of soap?
22 Nobody knows that. You talk about a
23 discretionary answer -- I mean question. I mean,
24 whatever the answer is, it was probably wrong
25 anyhow, to disenfranchise people from voting.

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1 understand that.

2 But when you think of the
3 circumstances involved, and, you know, I do a lot
4 of voter registration, and I've approached people
5 about registering and they're like, no, they've
6 got to have that voter ID, and I'm not going to
7 that DPS office. I can't take people to the DPS
8 office. I work a job, and I have
9 responsibilities, too.

10 Q. Ms. Lydia, what do you believe is the
11 purpose of SB 14?

12 A. I think the intent and purpose was to
13 disenfranchise some voters, and it happens to be
14 minorities.

15 Q. So do you believe that SB 14 was
16 enacted with discriminatory intent --
17 discriminatory intent?

18 A. I do. I believe that.

19 Q. Does the Texas NAACP contend that any
20 legislature who voted for SB 14 acted with
21 discriminatory intent?

22 A. I think that by virtue of their vote
23 and the impact that it would have on certain
24 minorities in the state, I think there was an
25 intent by those legislators to be a part and

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1 parcel of that.

2 Q. Does the Texas NAACP contend that the
3 Texas legislature intended to harm minority
4 groups with the enactment of SB 14?

5 A. If harm is defined as minimizing their
6 votes within the state, yes.

7 Q. Are you aware of any polls taken by the
8 NAACP or any other entity that indicate whether
9 SB 14 is a politically popular bill?

10 A. No.

11 Q. Does the Texas NAACP support voter ID
12 requirements of any kind?

13 A. I think citizenship requirements.

14 Q. Does the Texas NAACP support voter
15 photo ID requirements of any kind?

16 A. I don't think that should be a
17 prerequisite to vote, that you have a picture on
18 a card. My citizenship alone should entitle me
19 to vote.

20 Q. Does the Texas NAACP contend that a
21 person who is trying to vote should be the same
22 person who is registered to vote?

23 A. Of course. We don't -- we're not
24 fostering voter fraud.

25 Q. I don't think I've already asked this

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1 Marion County Election Board?

2 A. No.

3 Q. You're not aware of that law?

4 A. No.

5 Q. Do you -- with regard to voter ID laws
6 being proposed in other states, does the Texas
7 NAACP reach out to other branches of the NAACP in
8 those states to discuss concerns or share
9 information about voter ID legislation?

10 A. Yes, we definitely do.

11 Q. And who is in charge of doing that at
12 the Texas NAACP?

13 A. Well, it's not so much somebody being
14 in charge of it. We have national conventions
15 and regional conferences where we do discuss the
16 various legislative activities that are going on,
17 and then we have a legislative arm of the NAACP
18 that also filters down information to us about
19 what's going on in other states regarding to any
20 type of legislation.

21 Q. And in that process, has there ever
22 been an exchange of material between Texas NAACP
23 and NAACP conferences in other states?

24 A. I'm really not sure on that. I would
25 think that we -- that they know about legislation

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1 question. If I have, please let me know.

2 A. Okay.

3 Q. To your knowledge, have any Texas NAACP
4 members ever expressed support for SB 14?

5 A. I have never heard anyone personally
6 say they support SB 14, in the minority
7 community.

8 Q. Okay. I've got one follow-up question.

9 A. Okay.

10 Q. We're going to take a trip back to the
11 beginning parts of this deposition.

12 A. Oh, okay.

13 Q. When we're talking about the NAACP --
14 Texas NAACP's activities with regard to voter ID
15 legislation, its legislative activities --

16 A. Um-hum.

17 Q. -- not just with respect to SB 14 but
18 any legislation --

19 A. Okay.

20 Q. -- does the Texas NAACP track or
21 monitor voter ID laws in other states?

22 A. Yes, we do.

23 Q. Are you aware of the voter ID law in
24 the state of Indiana that was the subject of a
25 case titled Crawford versus I believe it was

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1 that's going on in our state. I mean, everything
2 that we do is approved by the national office.
3 And the national office does, within their sphere
4 of activities, pass on information to other state
5 conferences, I'm sure, and say, you know, this is
6 a good source for you to contact regarding how to
7 handle this particular situation, because of the
8 activities they've had in their state.

9 Q. Does the Texas NAACP commit operating
10 funds every year to the monitoring and tracking
11 of legislation -- voter ID legislation in other
12 states?

13 A. No.

14 Q. Ms. Lydia, does the Texas NAACP expect
15 that it will continue to be able to fulfill its
16 stated mission into the foreseeable future?

17 A. Yes.

18 Q. Okay. I have no other questions to ask
19 you at this time.

20 May I ask you if now that you've
21 had a chance to contemplate any previous answers,
22 is there anything you'd like to supplement or
23 clarify regarding any answer you've given here
24 today?

25 A. No.

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1 Q. No.
 2 MR. TATUM: Well, I have no more
 3 questions. I pass the witness.
 4 MS. RUDD: I have no questions.
 5 MS. MILLER: No questions from the
 6 United States.
 7 MR. TATUM: Well, we'll reserve
 8 further questions, and I believe we can go off
 9 the record now.
 10 THE COURT REPORTER: Would you like
 11 the witness to read and sign her deposition?
 12 MS. RUDD: Yes, ma'am.
 13 THE COURT REPORTER: And may I send
 14 it to you?
 15 MS. RUDD: You may.
 16
 17
 18 (The deposition concluded on
 19 June 6, 2014, at 1:11 p.m.)
 20
 21
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 23
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1 I, LINDA LYDIA, have read the foregoing
 2 deposition and hereby affix my signature that
 3 same is true and correct, except as noted above.
 4
 5
 6
 7 LINDA LYDIA
 8
 9 THE STATE OF: _____
 10 COUNTY OF: _____
 11
 12 Before me, _____, on this
 13 day personally appeared
 14 LINDA LYDIA,
 15 known to me (or proved to me under oath or
 16 through _____) to be
 17 the person whose name is subscribed to the
 18 foregoing instrument and acknowledged to me that
 19 they executed the same for the purposes and
 20 consideration therein expressed.
 21 Given under my hand and seal of office this
 22 _____ day of _____, 2014.
 23
 24
 25

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1 CHANGES AND SIGNATURE
 2 LINDA LYDIA - JUNE 6, 2014
 3 PAGE-LINE | CHANGE REASON
 4 _____
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1 STATE OF TEXAS)
 2 COUNTY OF DENTON)
 3
 4 REPORTER'S CERTIFICATION
 5
 6 I, Karen L. D. Schoeve, Registered
 7 Diplomat Reporter and Certified Realtime
 8 Reporter residing in the State of Texas, do
 9 hereby certify:
 10 That the foregoing deposition of LINDA
 11 LYDIA was taken before me at the time and place
 12 herein set forth and that the witness was put
 13 under oath by me;
 14 That the testimony of the witness and all
 15 objections made at the time of the examination
 16 were recorded stenographically by me, were
 17 thereafter transcribed under my direction and
 18 supervision and that the foregoing is a true
 19 record of same, to the best of my ability.
 20 I further certify that I am neither counsel
 21 for nor related to any party to said action, nor
 22 in any way interested in the outcome thereof.
 23 In witness whereof, I have subscribed my
 24 name this 9th day of June, 2014.
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